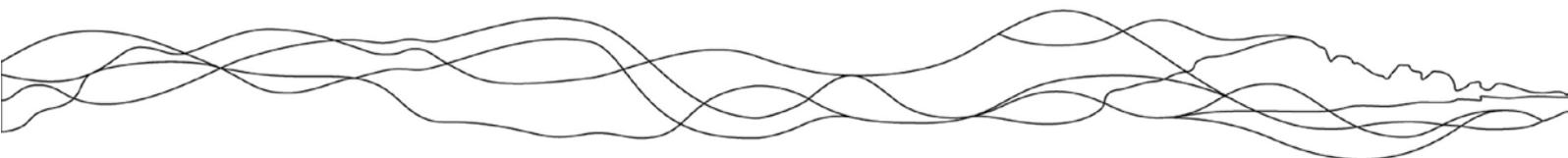
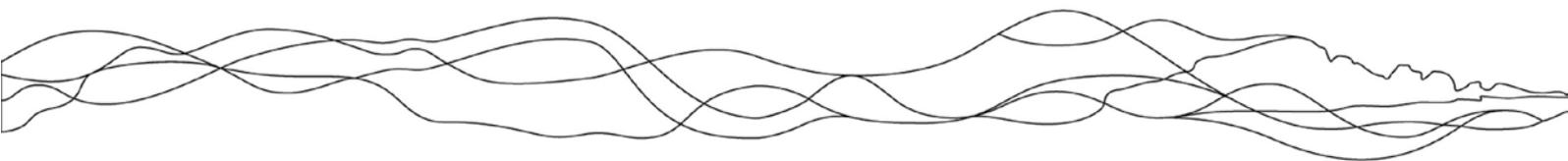


**TWYFORD  
NEIGHBOURHOOD  
DEVELOPMENT PLAN  
SUBMISSION  
FULL REPRESENTATIONS**

28<sup>th</sup> January 2021 – 25<sup>th</sup> March 2021



Respondent Reference:	R1
Organisation or Individual:	Highways England
Agent Details:	N/A



**From:** [Ginn, Beata](#)  
**To:** [Neighbourhood](#)  
**Cc:** [Planning SE](#); [Blake, Patrick](#)  
**Subject:** FORMAL RESPONSE: #12483 Twyford Neighbourhood Plan - Submission to the South Downs National Park Authority  
**Date:** 08 February 2021 14:59:10  
**Attachments:** [image001.jpg](#)

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**FAO:** Neighbourhood Planning Team

**Our Reference: #12483**

**RE: Twyford Neighbourhood Plan - Submission to the South Downs National Park Authority**

Thank you for inviting Highways England to comment on the above Consultation. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M3 motorway. We have reviewed the above consultation and have 'No Comments'.

Regards

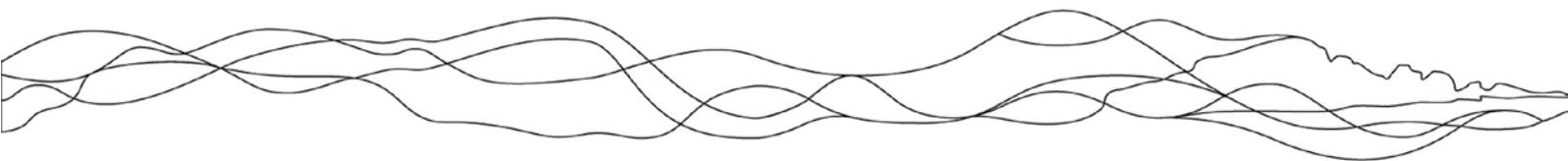
**Mrs Beata Ginn**

**Assistant Spatial Planner (Area 3)**

Highways England | Bridge House | Walnut Tree Close | Guildford GU1 4LZ

**Tel:** +44 (0) 300 470 1118 **Mobile:** 0787 204 6392

Respondent Reference:	R2
Organisation or Individual:	Resident 1
Agent Details:	N/A



**Message Details:**

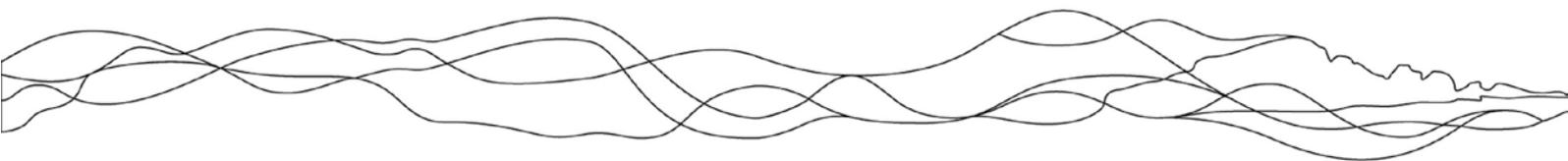
Name: Graeme Sewell

Email: [REDACTED]

Subject: CP3-5

Message: As significant changes seem to still being made to the TNP I was disappointed to see the word 'supported' replaced by 'approved'. The reason given was Clarity and it is claimed this is not a Policy change. However I believe there is a substantial difference between the meaning of these two words which changes this policy from one of general support to one of guaranteed acceptance. If it is implicit in the TNP that plans will be approved it will not give local residents nearly as much input into any future changes to school access which may substantially effect them. I would urge you to reverse this change.

Respondent Reference:	R3
Organisation or Individual:	Natural England
Agent Details:	N/A



Date: 25 February 2021  
Our ref: 343357



Chris Paterson  
South Downs National Park Authority  
neighbourhood@southdowns.gov.uk  
**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Chris,

**Planning consultation:** Twyford Neighbourhood Plan - Regulation 16

Thank you for your consultation on the above dated 28 January 2021 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

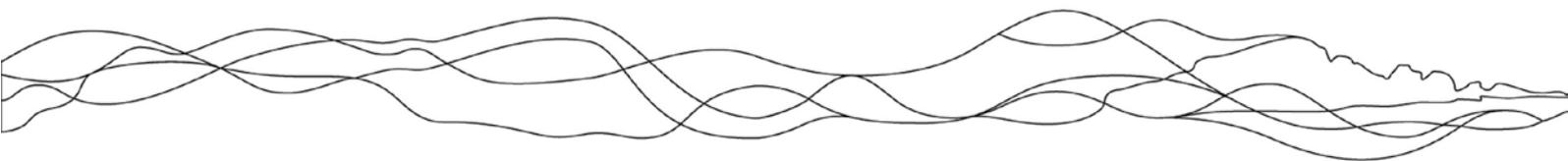
We are a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England support the inclusion in the plan of policies to protect and enhance the natural features and sites within the area and the landscape setting of the neighbourhood. We have no specific comments to make.

Yours sincerely,

Joseph Forster  
Thames Solent Team  
Sustainable Development

Respondent Reference:	R4
Organisation or Individual:	Resident 2
Agent Details:	N/A



**From:** [REDACTED]  
**To:** [Neighbourhood](#)  
**Subject:** Representation concerning Twyford Neighbourhood Plan  
**Date:** 28 February 2021 13:45:47

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[REDACTED]

Dear South Downs Neighbourhood Team,

I have two comments regarding item WE1 Flood Risk Management of the Twyford Neighbourhood Plan:

1. We are extremely lucky to have upstream water storage capacity in the fields along the Hazeley Valley running from Morestead towards Twyford.

The lakes that form in these fields to the east of the village when the bourne flows, as featured in the Halcrow Report, mean that the water of the bourne does not flow through the village all at the same time. Rather, the flow is slowed down and peak discharge through the village is reduced.

Any future village drainage system needs to work in harmony with these lakes.

The latest research into flood management, such as the Making Space for Water programme and the work of Professor Hannah Cloke of the University of Reading (<https://www.reading.ac.uk/h-l-cloke.aspx>), points to the crucial role of upstream water storage and to the fact that farmers can receive income from the government for this use of the land.

Therefore, whatever happens in terms of Twyford's future development, the natural water storage system we are extremely fortunate to have should be protected.

2. Given the shallow gradient of the main culvert at the bottom of Finch's Lane near St. Mary's Terrace and the associated risk of this part of the culvert silting up regularly, it would be a good idea to put catchment pits at entrances to the culvert along its length wherever possible in order to intercept silt before it gets into the main pipe itself. These pits should be regularly emptied.

The effect of this would be to maintain the water-carrying capacity of the culvert at a very high capacity, again reducing the risk of flooding in the village.

Please feel free to ask if you require any further information about these ideas.

Many thanks.

Best regards,

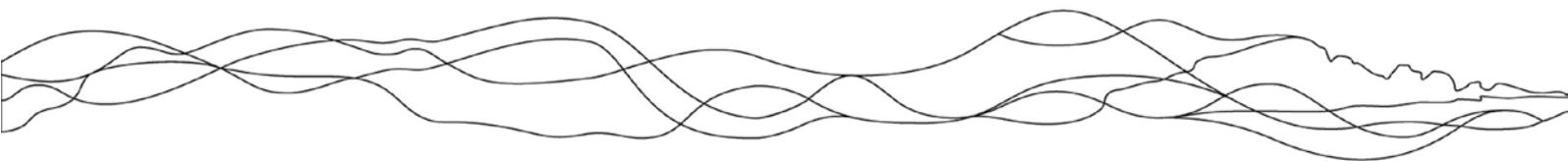
David Sullivan

Sent from my iPhone

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[Mark it as spam](#)  
[Blacklist sender](#)

Respondent Reference:	R5
Organisation or Individual:	Twyford Waterworks
Agent Details:	N/A



**From:** [REDACTED]  
**To:** ["Jamie Matthews"; Neighbourhood](#)  
**Subject:** RE: South Downs National Park Authority Consultation on Twyford Neighbourhood Plan 2021  
**Date:** 03 March 2021 11:21:17  
**Attachments:** [image001.png](#)  
[image002.jpg](#)

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Dear Hilary/Jamie,

Thank you for your email of 27<sup>th</sup> January.

The Twyford Neighbourhood Plan has now been reviewed by our Trustees, and we have just one further comment to make please. This is for an amendment to Map 10 on p45, which no longer shows Twyford Waterworks as a Scheduled Monument (as it did in the pre-submission version). We would ask please for the map to be corrected to show this. Twyford Waterworks is correctly listed as a Scheduled Monument on p43.

Could you confirm please when the alteration to the map is made.

Kind regards,

Graham.

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**Graham Feldwick**

*Vice Chair: Twyford Waterworks Trust*

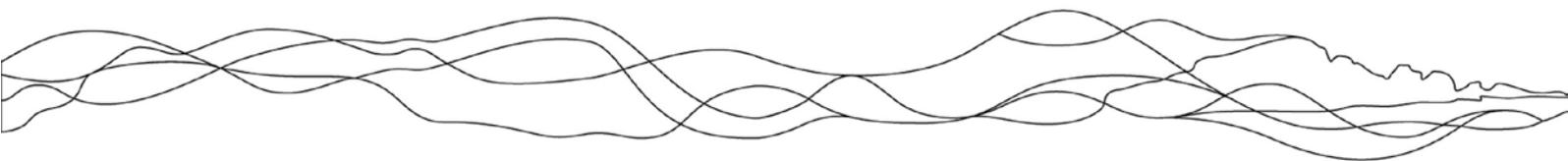
Tel: [REDACTED]

Email: [REDACTED]

visit our website [www.twyfordwaterworks.co.uk](http://www.twyfordwaterworks.co.uk)

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Respondent Reference:	R6
Organisation or Individual:	SDNPA
Agent Details:	N/A



**SDNPA comments on the Twyford Submission Neighbourhood Plan – agreed by SDNPA planning committee on 11 March 2021**

Reference	Comment	SDNPA Recommendation
General comments	<p>The Parish Council and Neighbourhood Planning group should be commended on progressing the Twyford Neighbourhood Plan (TNP) to this stage. The preparation of the TNP has been complex due to the sensitive local environment and having to consider the sensitivity of internationally designated sites, and balancing this with the community's aspirations for development to meet locally identified housing need.</p> <p>The SDNPA also recognise the hard work and effort which has gone into selecting a site for housing, identifying a site which offers a range of community benefits as well as much needed housing. The site will require careful consideration in its development and we welcome the Parish Council's involvement in the Pre application process to date.</p>	
General Comments	<p>As previously stated in the SDNPA response to the Regulation 14 consultation there are a number of TNP policies which simply refer to a policy within the South Downs Local Plan (SDLP) and stipulate that the SDLP policy must be considered. As the SDLP will form part of the Development Plan, alongside the TNP, these references are not necessary. The SDNPA appreciate TPC have moved a large number of these policy references to the supporting text, but there are still policies which include signposting to a particular SDLP which isn't necessary, such as policy HNI.</p>	<p>Remove references to SDLP policy from TNP policies. If necessary and appropriate SDLP policy reference could be included within the supporting text of each TNP policy.</p>
General Comments	<p>As currently drafted the TNP policies include reference to policy numbers of previous version of the TNP. This could cause confusion for the reader and it is suggested that reference to previous policy numbers is removed.</p>	<p>Remove older policy references in policy title, for example at HN2 the older policy references should be removed Policy HN2 (<del>HN2 &amp; 3 amalgamated</del>)</p>

Section I.3	The second sentence refers to the remaining 14 years of the plan period, however, the plan period remaining is currently 12 years.	It is a plan for the next 14 <del>2</del> years to 2033
Section I, Paragraph I	Reference to a minimum of 20 dwellings should amended to read approximately as per SDLP policy SD26	Another key decision for Twyford is the allocation of one or more sites for <del>a minimum of</del> <u>approximately 20</u> dwellings between 2019 and 2033
Policy SBI	The supporting text to policy SBI refers to a minimum of 20 dwellings, this should be amended to read approximately 20 dwellings as per Policy SD26	The TNP is required to allocate land for <del>a minimum of</del> <u>approximately 20</u> dwellings
Policy SB2	The supporting text to this policy lists several SDLP policies to which this policy relates. However, many of these policies are not specific to development outside the settlement boundary, they are also concerned with development inside the settlement boundary, therefore this list should be revised or deleted. As currently drafted this policy does not make it clear that development outside the settlement boundary (in open countryside) will only be permitted in exceptional circumstances. This will ensure the reader understands that development outside the identified Settlement Boundary will only be permitted in exception circumstances, which include a range of policies set out in the TNP and SDLP.	Review the list of SDLP policies in the supporting text  1. Development outside the settlement boundary will <u>only</u> be permitted <u>in exceptional circumstances as per</u> <del>subject to the following policies of the TNP as set out in detail as follows:</del>
Policy HNI	Part 3 of the policy requires maximum floor areas for new housing. It would be helpful if the supporting evidence provided more explanation of the rationale for this, other than New Forest Local Plan. There would also need to be evidence to support such a requirement in Twyford. The additional text does not provide sufficient justification for this approach	Provide additional evidence to justify the policy requirement for maximum floor areas for new housing
Policy HN4	Part 2 of the policy seeks to control the eligibility for occupation of the new affordable housing. However, as currently drafted it is not clear what these eligibility criteria are. The policy states that the eligibility for occupation is as set out in HN4-1, however, HN4 – is only a reference to	<del>Policy HN4 – Rural exception sites</del> <del>1. Proposals for rural exception sites will be permitted with SDLP SD29.</del> <del>2. The eligibility for occupation will be as set out in HN4 – 1. [HN4 – 2]</del>

	<p>SDLP policy SD29. Clarification is required as to whether TPC are setting occupation eligibility as per the requirements in the SDLP. If HN4 is only signposting to SD29 and also referring to the occupation conditions set out in SD29, this policy is not required as it offers no more detail than policy SD29 of the SDLP.</p>	
Policy HN5	<p>Part 2 of the policy places extra policy restrictions in relation to the previous policy clauses set out at HN5 -1. Many of these additional requirements would be required by policy in the TNP or policies in the SDLP, therefore many of the additional criteria are not necessary and should be deleted. Point a is already covered by policy SD31. Point b is already covered by policy HNI, therefore these policy requirements can be deleted. Part 2c) should be presented as a separate policy relating to development in conservation areas. This will need to be addressed in order for the plan to meet the basic condition of conformity with the local plan and national planning policy; where plans should set out a positive strategy for the conservation and enjoyment of the historic environment. An assessment of how the loss of garden and walls within the Conservation Area will impact on the heritage assets is required.</p>	<p>I. Development is subject to the following restrictions:</p> <ul style="list-style-type: none"> <li>a) <del>for categories 1 a, 1 b and 1 d, the increase in floor space is limited to 30% and accords with SD 31.</del></li> <li>b) <del>for category c, new detached houses should not exceed 150 m2</del></li> <li>c) within the Conservation Area there is to be no loss of garden land or walls</li> </ul>
Policy HN6	<p>Part 1a of the policy as currently drafted requires a limitation of 30% on extensions and replacement dwellings as per Policy SD30 and SD31 of the South Downs Local Plan. Policies SD30 and SD31 require a limitation of approximately 30% on this form of development and the TNP policy should be modified accordingly</p> <p>Part 1c of the policy appears to prioritise two particular types of institution. It is not clear why these particular institutions are referred to in the policy, it is recommended that this aspect of the policy is removed.</p>	<ul style="list-style-type: none"> <li>a) For extensions and replacement dwellings, policies SD 30 and SD 31 will apply with <u>limitations of approximately the 30% being applied</u> in each and every case.</li> <li>c) <del>At racing stables, hostel accommodation tied to the operation.</del></li> </ul>

<p>Policy HN7</p>	<p>The intention of is to be welcomed given the support for increased provision of elderly care as set out in the SDLP. However, there are a number of policy criteria which seem restrictive given the nature of the facility.</p> <p>Policy Criteria 1b states that the expansion of the facility must be justified by local need. It is likely that people from outside the parish may want to live in any expanded facility, and the wider need for elderly care provision needs to be taken into consideration.</p> <p>Part 2 of this policy, specifically Policy criteria 2a requires a landscape led design brief to be prepared. The SDNPA would require a landscape led approach to any expansion of the facility, but not necessarily a separate design brief.</p> <p>Policy clause 2c requires no increase in traffic generation as a result of redevelopment, given the potential range of redevelopment opportunities this may significantly restrict possible redevelopment</p> <p>Part 2 policy clause g only serves to repeat policy requirements covered by other policies in the TNP and SDLP and can therefore be deleted</p>	<p>Consider deletion or amendment to policy HN7 1b.</p> <p>2. The change of use or redevelopment of Orchard Close to residential will be permitted provided</p> <p>a) <del>A landscape led design brief is first prepared</del> <u>Any redevelopment should seek to</u> retaining the existing landscape garden with its trees.</p> <p>b) Any new buildings to be within or close to the footprint of the existing buildings.</p> <p><del>e) There is no increase in traffic generation.</del></p> <p>d) No new vehicular access point is formed.</p> <p>e) The Edwardian house may be retained or replaced as a private house.</p> <p>f) New dwellings to be for the elderly</p> <p><del>g) Affordable housing to accord with HN4/ SD 28.</del></p>
<p>Policy BE1</p>	<p>As currently drafted Policy BE 1 part 1 offers no further policy requirement than SDLP policy SD35. Therefore, this part of the policy is unnecessary as it only duplicates SDLP policy.</p> <p>Part 2 of the policy, applies SDLP policy to the specific local requirements, which is welcomed. However, the policy only allows for redevelopment on a like for like basis outside of the uses specified, this is considered too restrictive and should be deleted.</p>	<p><del>1. Within the settlement boundary, development, including change of use and redevelopment for economic purposes will be permitted, in accordance with SD 35.</del></p> <p>2. Outside the settlement boundary including BE2, new development, redevelopment and expansion, whether of site area or buildings will be permitted in accordance with SD 34, and the uses specified in SD34 (a—d and g only). <del>In other cases re-development will be permitted on a 'like for like' basis.</del> Changes of use for commercial purposes will be permitted provided that no additional heavy traffic is generated</p>

<p>Policy BE2</p>	<p>The SDNPA welcome the designation of the site as a local employment site as per paragraph 7.140 of the SDLP. Northfields Farm is identified as site W1 in the Employment Land Review Update (2017) as both an existing and potential employment site with the following commentary:</p> <p>‘Fully occupied mostly high quality business park for local businesses; adjacent to potential housing site in draft Twyford NDP; protected by draft general safeguarding policy in NDP; part of site permitted for new B uses.’</p> <p>Criterion 2 of Policy BE1 is unduly restrictive as it only allows like for like replacement of buildings on the estate. The supporting text refers to a new route to the north west of the site but no details are provided on the viability or feasibility of this new route.</p> <p>The site allocation should not include the area which is currently subject to an extant planning permission as this would not conform to Planning Practice Guidance which states the NDPs should not seek to affect extant planning permission. The site identified on Map 6 should be amended accordingly.</p> <p>Policy BE2.1b requires the preparation of a Master plan covering a wide range of matters. This is considered to be appropriate, if the entire site is proposed for development, however, the requirement for a Master plan is not necessary if a development proposal is submitted for a part of the site.</p>	<p>Consideration should be given to redrafting the policy so that it does not seek to control an extant planning permission. The provision of a Master plan is only relevant where proposals for the development of the entire site are submitted.</p> <p>Delete Criterion 2 of the policy</p> <p>Review supporting text specifically reference to a new route to the North West of the site, insufficient detail on this potential route. Provide further information or remove reference from supporting text</p>
<p>Policy LHE2</p>	<p>Supporting text for policy LHE2 refers to the adoption of SDLP policy SD4 and SD6 for Twyford, these policies will apply to Twyford as part of the development plan for the park so this reference is not necessary.</p>	<p>Delete reference to adoption of SDLP policies for Twyford</p>

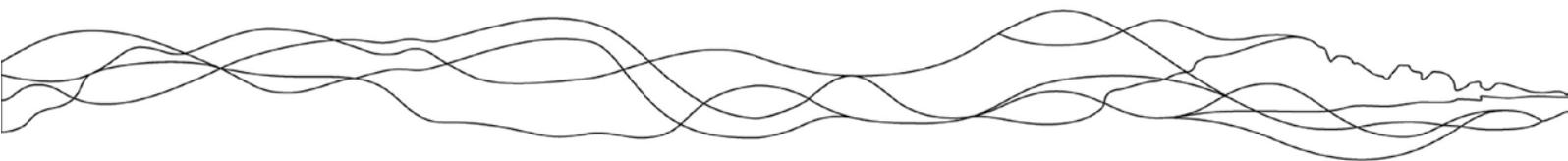
	<p>The policy refers to SDLP policy SD4 and specific policy criteria. However, it omits policy clause 4 from part 2 of SDLP policy SD4. Policy clause 4 of SD4 is particularly important as it seeks to safeguard blue and green corridors. A number of the views set out in Table 3 relate to the Conservation Area and heritage assets within the parish. Reference within the policy is made to Policy SD4 of the SDLP. However, to be in general conformity with the policies within the SDLP, it should set out how SD4 2) is applicable to Twyford and how the Parish Council has demonstrated their understanding of the design principles of the landscape or illustrated how the protected views set out in Table 3, where heritage assets are listed, have been identified.</p> <p>More information on how these views contribute to the significance of the heritage assets as well as allowing an appreciation of the wider historic environment should be provided within the supporting text or a signpost to a document submitted as an evidence paper.</p>	<p>If references to SDLP policies are to be included in the TNP policy (although this is not necessary) reference to the relevant aspects of the policy is important</p> <p>Further clarification of how policy SD4 is to be applied in Twyford, it should set out how SD4 2) is applicable to Twyford and how the Parish Council has demonstrated their understanding of the design principles of the landscape or illustrated how the protected views set out in Table 3, where heritage assets are listed, have been identified.</p>
Policy LHE3	<p>This policy lacks focus of the various heritage assets located within the parish and refers solely to SDLP policies. The policy remains generic with little detail and it is not clear the purpose of the policy itself. There is no particular reference to what the areas are within the supporting text and the policy refers to a map which does not clearly define the areas listed in the key. It is also not clear where the supporting evidence can be found and the key conclusions/recommendations of this evidence. Policy LHE3 suggests that only the areas on the map are covered by the policy rather than all the heritage assets and the historic environment within the parish. In order to be in compliance with national planning policy, it is recommended Policy LHE3 should set out a positive strategy for the conservation and enjoyment of the historic environment. National Planning</p>	<p>Consider revision of policy wording to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale</p>

	Practice Guidance states 'neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale'.	
Policy LHE4	In line with the National Planning Policy Framework (paragraph 185), plans should set out a positive strategy for the conservation and enjoyment of the historic environment. In developing their strategy, plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting.	In order to be in conformity with national planning policy, it is recommended that this policy is focussed on facilitating the conservation, enhancement and regeneration of the Conservation Area.
Policy LHE5	Supporting text to policy LHE5 refers to the relationship with a number of SDLP policies, the reference to policy SD2 Ecosystem services is incorrect Part 2 of policy LHE5 refers to 'open land', is this in reference to undeveloped land, rather than the character of the land being open? Clarification is required in the supporting text to define what the TNP considers to be open land.	SD 2 Ecosystem <u>Services</u> Provide clarification of the term open land in the context of policy LHE5
Policy LHE6	Part 2 of this policy proposes a cross border policy to ensure the conservation and enhancement of the river Itchen SAC. As drafted this policy cannot be applied in the determination of planning applications and proposes the development of new policy, this is not appropriate for the development plan and should be deleted. The SDNPA is preparing a technical advice note on Habitat Regulation Assessment matters, which will take into consideration international sites such as the River Itchen, as well as the provisions set out in policy SD9 of the SDLP Part 3 of this policy refers to the need to protect tree's hedges and woodland in Twyford, but specifically within the settlement boundary and conservation area. Is the reference to the settlement boundary and Conservation Area necessary, as currently worded the policy suggests that	Delete policy criteria 2 of policy LHE6  Consider rewording the policy to ensure the policy intention is clear

	SDLP policy SD11 will only apply within the settlement boundary and Conservation Area	
Policy WE1	It appears that some wording has been omitted before the policy criteria start. A currently drafted the policy does not make sense	Consider whether policy wording has been omitted accidentally and reword policy
Policy MA1	Part 1 and 2 of this policy only refer to SDLP policies which already form part of the development plan, therefore repeating the policy is not necessary. The 2 <sup>nd</sup> part of the policy seeks to encourage the highways authority to deliver a local cycle path scheme, this would not be relevant in the determination of a planning application. Therefore it is recommended that this policy is deleted.	<ol style="list-style-type: none"> <li>1. <del>Rights of Way will be extended and enhanced to secure the objectives of SD 20, 4; 5; &amp; 6.</del></li> <li>2. <del>TPC working with HCC and WCC will improve cycling facilities along the B3335/B3354 through the village from Hockley traffic lights to Golden Common. Land adjacent to this route will be safeguarded for this purpose.</del></li> </ol>
Policy MA2	<p>The SDNPA's Parking Supplementary Planning Document will provide additional detail to supplement SDLP policy on this matter, therefore part 1 and 2 of the policy are not necessary and should be deleted.</p> <p>Part 3 of the policy is covered by requirements set out in Policy DB1 of the TNP therefore this aspect of the policy is also unnecessary and can be deleted.</p>	<p><del>Parking will be provided in accordance with SD 22 and the following:</del></p> <ol style="list-style-type: none"> <li>1. <del>Until SDNP parking standards are adopted, the standard WCC (for residential) and HCC (for all other land uses) will apply.</del></li> <li>2. <del>Development proposals that result in a loss of existing car parking spaces will only be permitted if it can be demonstrated that suitable alternative provision can be made in the vicinity.</del></li> <li>3. <del>Land to accommodate up to 40 additional car parking spaces is reserved on land adjoining the existing Parish Hall car park.</del></li> </ol>
Policy MA3	As this policy is not related to land use matters it is recommended that the policy is stated as a community aspiration, and clearly distinguishable from planning policies	Delete policy and if appropriate state this as a community aim or aspiration
Policy MA5	Policy MA5 concerns itself primarily with encouraging sustainable forms of transport and traffic management proposals. These are not appropriate for Neighbourhood Plan policy; they are matters for the highways authority to consider when reviewing the road network in the parish. It may be appropriate for these aspects to be stated as community aspirations or community aims, clearly identified as separate to land use policies of the TNP. This will allow	Delete policy and if appropriate state this as a community aim or aspiration

	the aspirations to be recorded within the TNP as a community aim, rather that deleted entirely as they are not appropriate as planning policy	
Policy SSI	As currently drafted policy SSI does not allow for the provision of solar panels or wind turbines. This is considered too restrictive and would not allow for small scale solar array or small scale wind turbines as per SDLP policy SD5 I	Consider review and amendment to policy SSI to align with the approach in SDLP policy SD5 I
Policy DBI	<p>The supporting text to Policy DBI states that 8 of the new homes are to be affordable, this does not comply with policies of the SDLP or TNP, this should state that 10 homes will be affordable.</p> <p>Part of the <del>boundary</del> <u>proposed housing site allocation is within</u> of the site is in close proximity to the Conservation Area. It is recommended that the policy includes a reference to the Conservation Area and its setting so that it sets out a positive strategy for the conservation and enjoyment of the historic environment and enables development that will make a positive contribution to the heritage asset and reflect and enhance local character and distinctiveness.</p>	<p>Site 26 is the principle site for allocation of new houses in the Neighbourhood Plan, and is to provide 20 houses (see HN3) of which <del>8</del> <u>10</u> are to be affordable (see HN3) and additional car parking (see MA2).</p> <p><u>Include a reference to the whole allocation being in close proximity to the Conservation Area and part of the housing allocation site falling within the</u> <del>the close proximity</del> of the Conservation Area to ensure the development can make positive contribution to the <del>setting of the Conservation Area</del> <u>and its setting</u>.</p>

Respondent Reference:	R7
Organisation or Individual:	Southern Water
Agent Details:	N/A



**From:** [Policy Planning](#)  
**To:** [Neighbourhood](#)  
**Subject:** FW: South Downs National Park Authority Consultation on Twyford Neighbourhood Plan 2021  
**Date:** 22 March 2021 16:24:35  
**Attachments:** [image001.png](#)  
[Twyford NDP Making a representation guidance note.pdf](#)  
[TNP\\_Reg\\_16\\_Public\\_Notice\\_Email\\_Letter.docx](#)

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Dear Sir/Madam,

Further to the email below, inviting Southern Water to comment on the Submission Twyford Neighbourhood Plan, I confirm we have reviewed the Plan and are pleased to note that our previous comments have been addressed.

We therefore have no other comments to make (other than to point out what must be a typographical error in Policy WE2 which states 'Part H3 of the Building *Renovations*' which should read 'Part H3 of the Building *Regulations*').

We look forward to being kept informed of the Plan's progress.

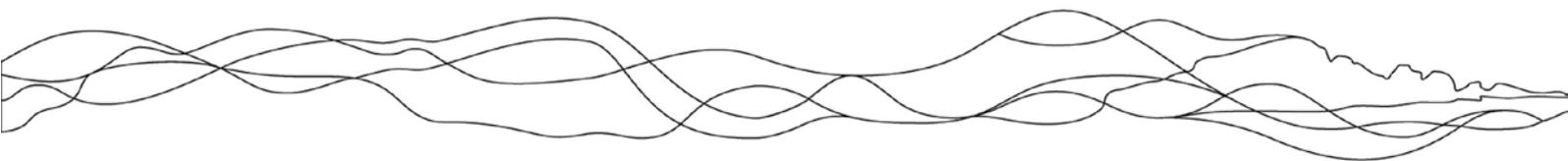
Yours faithfully,

**Charlotte Mayall**

**Regional Planning Lead**

**Hampshire & West Sussex**

Respondent Reference:	R8
Organisation or Individual:	Southern Planning
Agent Details:	N/A



**From:** [Kim Blunt](#)  
**To:** [Neighbourhood](#)  
**Cc:** [twyfordneighbourhoodplan@gmail.com](mailto:twyfordneighbourhoodplan@gmail.com)  
**Subject:** South Downs National Park Authority Consultation on Twyford Neighbourhood Plan 2021 - Representations on behalf of Morestead Racing Stables  
**Date:** 18 March 2021 15:53:59  
**Attachments:** [image002.jpg](#)  
**Importance:** High

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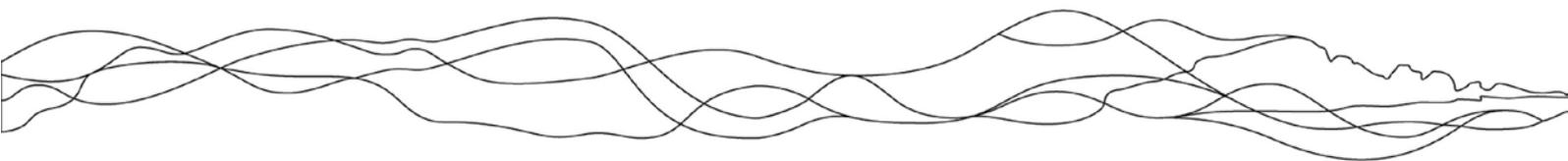
Dear Sir or Madam

I am instructed to forward comments on behalf of my clients, Mr & Mrs Christopher Gordon of Morestead Racing Stables, as follows:

Draft Policy HN6 for Housing outside the settlement boundary and, in particular, **because the provision for the hostel accommodation tied to the operation at the racing stables (point c of draft Policy HN6) is essential for the continued operation of Morestead Racing Stables.**

This view is supported by Twyford Parish Council who have stated their wish to retain the wording (now at point c) of Draft Policy HN6 copied below). The Parish Council consider the 'Racing Stables are a flourishing feature of Twyford; they have special needs for their type of business. "hostel" accommodation for stable lads is a requirement of racing stables.'

Respondent Reference:	R9
Organisation or Individual:	Resident 3
Agent Details:	N/A



**From:** [REDACTED]  
**To:** [Neighbourhood](#)  
**Subject:** Twyfod neighbourhood plan-Site 26  
**Date:** 18 March 2021 15:00:09

---

Dear Sirs

I write in support of site 26 to be allocated to housing in the neighbourhood plan for 20 residential units. It is the site within the Parish that can offer further car parking within the village centre and adjacent to the surgery/shops.

The site is sustainable in terms of being within close proximity of village facilities.

The proposal conforms to both local and national policies and is deliverable.

The site would not have an adverse environmental impact on any scheduled sites within the area.

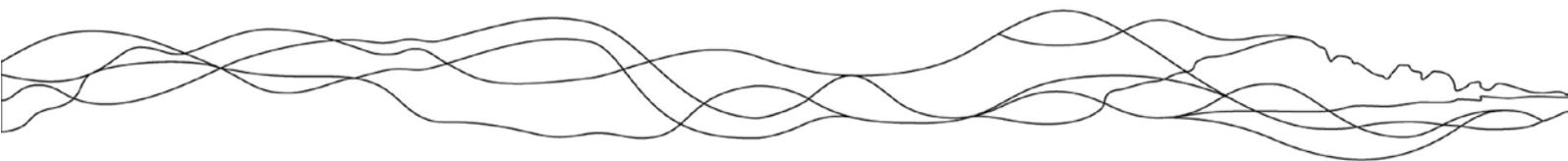
Regards

Philip Denée

--

[Mark it as spam](#)  
[Blacklist sender](#)

Respondent Reference:	R10
Organisation or Individual:	National Grid
Agent Details:	N/A



Our Ref: MV/ 15B901605



23 March 2021

South Downs National Park  
[neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk)  
**via email only**

Dear Sir / Madam

**Twyford Neighbourhood Plan Regulation 16 Consultation  
January – March 2021  
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

**Proposed development sites crossed or in close proximity to National Grid assets:**

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- [www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/](http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/)

Please also see attached information outlining guidance on development close to National Grid infrastructure.



### **Distribution Networks**

Information regarding the electricity distribution network is available at the website below:

[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

Information regarding the gas distribution network is available by contacting:

[plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

### **Further Advice**

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

**Matt Verlander, Director**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

**Spencer Jefferies, Town Planner**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Matt Verlander".

**Matt Verlander MRTPI**

**Director**

**0191 269 0094**

**[matt.verlander@avisonyoung.com](mailto:matt.verlander@avisonyoung.com)**

**For and on behalf of Avison Young**

## **Guidance on development near National Grid assets**

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

### Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets'*, which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's *'Guidelines when working near National Grid Gas assets'* can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

### How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

Avison Young (UK) Limited registered in England and Wales number 6382509.  
Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS



- National Grid's Plant Protection team: [plantprotection@nationalgrid.com](mailto:plantprotection@nationalgrid.com)

Cadent Plant Protection Team

Block 1

Brick Kiln Street

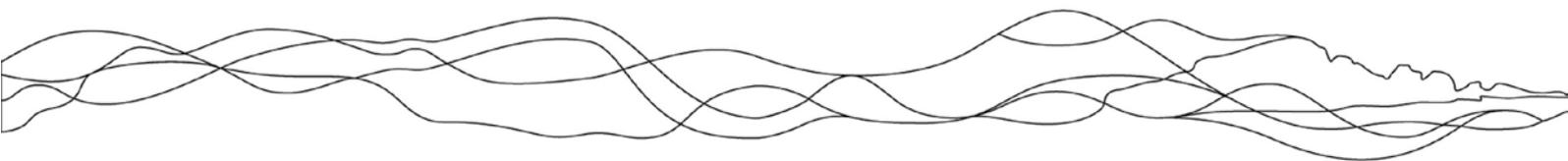
Hinckley

LE10 0NA

0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

Respondent Reference:	R11
Organisation or Individual:	Twyford School
Agent Details:	N/A



**Representations to  
Regulation 16 Consultation  
Twyford Neighbourhood  
Plan**

**On behalf of Twyford  
School**



*Twyford School*

Prepared by:

**Alice Drew**  
BSc (Hons) MSc MRTPI

**Date: March 2021**

**Ref: SDNP-353-AD**



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## **1.0 Introduction**

- 1.1 These representations have been prepared by Southern Planning Practice on behalf of Twyford School in response to the Regulation 16 Consultation of the Twyford Neighbourhood Plan (TNP) which has recently been submitted to the South Downs National Park Authority (SDNPA) for independent examination.
- 1.2 Twyford School are largely supportive of the TNP and believe it will positively help to guide new development in the village.
- 1.3 The focus of these representations is on three policies within the Submission Neighbourhood Plan, namely SB1 – The Settlement Boundary Policy, HN7 – Orchard Close and BE3 – Twyford Preparatory School. The representations also provide the Inspector with some background information on Twyford School.

### **Twyford School**

- 1.4 As set out in previous representations and as acknowledged on page 30 of the TNP, Twyford School is a major employer in the village and surrounding areas. The school contributes both socially and economically to the village through expenditure by both staff and parents in Twyford Stores and the Post Office and support for other facilities and services including the dentists, pharmacy, doctor's surgery, café, florists, graphics and signage businesses, and pubs. The school also shares facilities, training and visiting specialists with Twyford St Mary's where practical. The school provides employment for local people, with around a quarter of the school's staff living within the SO21 1 area.
- 1.5 Twyford School has been a pillar of the Twyford community for over 200 years. In this time the school has established a national reputation and grown from 100 to 400 pupils in the last century. The school is one of the oldest preparatory schools in the country providing educational facilities from nursery to Year 8 and educates approximately a fifth of the primary age children in the Parish and the immediate surrounding area. Current pupil numbers in the village are 28 students from Twyford and 14 students from Shawford. Whilst there are currently no plans to increase pupil numbers, the school is likely to evolve through the exploration of different learning opportunities.

- 1.6 An aerial photograph of the school is shown on the following page. The area outlined in blue is the main school site and the area outlined in red is the recently acquired site at Orchard Close.



- 1.7 The following sections of these representations respond to Policies SB1, HN7 and BE3 of the Twyford Neighbourhood Plan Submission Version Consultation Document (Regulation 16).

## 2.0 **Response to Policy SB1**

- 2.1 As raised in previous representations submitted to the Pre-submission TNP, the school do not fully understand the rationale behind the proposed amended settlement boundary which seeks to exclude the entire Twyford school site. The Twyford Parish Landscape Assessment Part 3: Settlement Boundary Review undertaken by terra firma Consultancy Ltd in February 2016, guided by the SDNPA Settlement Boundary Review: Methodology Paper, made several suggestions to expand and contract the settlement boundary, however none of these suggestions related to the removal of the Twyford School site from the existing settlement boundary.
- 2.2 We note that the Twyford Parish Council response set out on pages 36 and 37 of the main consultation responses schedule (29 October 2020) states that Policy BE3 replaces the settlement boundary and “*gives the school extra scope not less*”. If this is the case we are supportive of this approach, however we believe that the removal of the section of the school site which is currently included within the settlement boundary, as defined by the SDNPA, is not evidence based and as such the amended settlement boundary in the TNP should be challenged by the Inspector.

### **3.0 Response to Policy HN7**

- 3.1 We would like to make both the Twyford Neighbourhood Plan Group and the SDNPA aware that Orchard Close was acquired by Twyford School in January 2021. As such the first paragraph in respect of policy HN7 on page 22 of the TNP under '*Purpose of the Policy*' should be amended to reflect the School's ownership. We would also like to highlight to the Inspector that this Policy has been largely created when Orchard Close was put on the market in Summer 2020, since the Pre-submission TNP, and therefore has not been through the full TNP consultation process.
- 3.2 We acknowledge that Policy SD25 of the South Downs National Park Local Plan is quite general to cover all development in the National Park and we agree it is useful to have a Neighbourhood Plan Policy to guide development in local circumstances in accordance with Paragraph 13 of the National Planning Policy Framework (NPPF). However, we encourage the TNP to ensure that Policy HN7 is not overly restrictive to prevent the efficient use of an area of previously developed land outside of, but very well rated to, a settlement boundary.
- 3.3 With regards to the expansion of Orchard Close to provide additional facilities for the elderly, we do not believe such policy aspirations are evidence based. It is understood that the former care facility at Orchard Close ceased business due to lack of demand in this location. This lack of demand is evidenced by the Twyford Housing Need Survey Report which was undertaken in July 2015. This report confirmed at Paragraph 28 that only two households families needed support to live independently and three further households wanted to downsize and stay in the parish (Paragraph 25). Five households do not justify the provision of the care facility at Orchard Close. The TNP acknowledges that whilst the continued use of the site for provision for the elderly is preferred, this is subject to demand. We believe that the evidence presented in support of the TNP does not justify the need for the care home. It is also pertinent to note that there is an extant permission for a 131 bedroom care home at Humprey Farms in Twyford which is capable of being built out, however, it is understood that there may not even be the need for this facility and hence the TNP looks at options for the redevelopment of Northfields Farm and Hazeley Enterprise Park at Policy BE2.1 of the TNP.
- 3.4 With regards to the above, and the fact that Orchard Close is now under Twyford School's ownership with aspirations for the potential change of use of the site to boarding facilities or

other schooling facilities, we request that the Inspector seeks the following modification of criterion 2 of Policy HN7 “*The change of use or redevelopment of Orchard Close to residential or other suitable use will be permitted provided:*”. Our addition is added in red for ease of reference. We would also request that the Inspector removes any reference to the requirement for the site to provide elderly care facilities as there is no demonstrated need for such a use.

- 3.5 We are supportive that the site should be developed in a landscape-led manner however clarity is sought on Criterion a) which states “*A landscape led design brief is first prepared retaining the existing landscape garden with its trees.*”. We believe that a landscape report should only be required if a planning application for new built form is submitted on the site. The site is not of a size or in a highly sensitive location that would require it to have a landscape-led design brief.
- 3.6 In respect of Criterion b), Twyford School endeavour to make efficient use of the existing built form at on site at Orchard Close prior to considering the potential to seek permission for new buildings. The acquisition of the site and redevelopment by Twyford School should be looked on favourably by the TNP as it could reduce the need to provide additional buildings on the main school site considered under Policy BE3. This policy will be discussed in further detail later in these representations.
- 3.7 We understand and support the TNP aspirations to reduce traffic generation in the village and encourage this to be where possible and practical to do so. We believe that the traffic generated by Orchard Close will be reduced now it is in ownership of Twyford School. Whilst there may be some trips to and from the site, it will be integrated with the main school site and the level of traffic generated from the site is considered to be less than the previous care home use. The TNP should therefore support the redevelopment of the site for additional schooling facilities for Twyford School as it would fulfil criterion c).
- 3.8 Criterion d) of Policy HN7 states that there should be no new vehicular access to Bourne Lane. We support this element of the policy as we believe the existing access provides a largely suitable access to the site. As the site is now in Twyford School’s ownership and is likely to be used for additional school facilities, we would like to highlight that the School would seek to improve the pedestrian access to the site to ensure it is safe and suitable which would be

advantageous to the highway safety of Bourne Lane. If necessary, widening of the existing access may be sought, however an additional access is unlikely to be required.

- 3.9 Criterion f) states “*New dwellings to be provided for the elderly*”. It is unclear whether this means that the redevelopment of the site should only provide dwellings for elderly persons, or if it means that a proportion of any new dwellings on the site should be for the elderly. Clarity should be sought from the Inspector regarding the TNP’s intended meaning of this criterion. In fact, as set out above, there is no demonstrable need for the provision of a care facility in Twyford, let alone on this site. Therefore we request that the policy is amended to reflect this and any need for a care facility is appropriately removed.
- 3.10 In summary, we support the efficient use of land at Orchard Close for redevelopment, however we believe that Policy HN7 as currently written is over prescriptive and would appear to only allow the site to be used for care facilities for the elderly or redeveloped for residential uses which would be new dwellings for the elderly as required by criterion f). We believe the Policy should be reworded, as set out at paragraph 2.7, to provide a more flexible, efficient use of a previously developed site in Twyford. Such an approach would be in accordance with section 11 of the National Planning Policy Framework.

#### 4.0 **Response to Policy BE3**

- 4.1 We are supportive of the recognition that Twyford School is the largest employer in the village and that it is an integral part of the village which supports a range of facilities and services within Twyford. As such, the school should be able to evolve to provide further employment opportunities and maintain an integral part of the village. Policy BE3 recognises that the school is likely to provide additional facilities and evolve over the TNP period and sets out that the proposed policy allows for a wide range of possible developments. Twyford School support the approach of Policy BE3, however, a few comments on the policy wording and criteria are set out below.
- 4.2 Policy BE3 sets out that further development of the school will be supported subject to the prior preparation of a master plan. Clarity is sought with regards to when and how this master plan would be approved by the TNP. Whilst it is understood why the TNP would like to see a master plan of the site, given the recent acquisition of Orchard Close and changes in teaching practices, it is believed that a detailed master plan would not be appropriate as it is quite likely to continue to evolve. Instead, we believe an indicative parameter master plan should be sought to be submitted with any future planning applications to show how the school intends to develop the site over the next 10 years. We would also like to highlight that whilst a master plan could detail the school's aspirations, each planning application should be considered on its own merits.
- 4.3 Twyford School prepared a master plan in 2017 which detailed aspirations for the school over approximately a 10-year period. This document was an internal document which was mainly shared with governors and management; however, it was shown to the local community in 2018 for information purposes. Since this time, and in light of the acquisition of Orchard Close, which may allow achievement of some of the school's objectives, the way in which the school's aspirations will be accommodated has changed. As such, the master plan is considered to be somewhat out of date.
- 4.4 Criterion a) of Policy BE3 sets out that the master plan should incorporate "*Proposals for access and movement which reduces both the use of the car and the current impact of pupil related traffic on the village and local roads*". Whilst Twyford School are supportive of the TNP

trying to reduce traffic in the village, we believe it needs to be realistic and seek to minimise additional traffic and look at the potential to reduce existing traffic in Twyford. Twyford School have recently increased the morning bus service capacity to help reduce the reliance on the private car and therefore reducing traffic generated to and from the site in peak morning hours. At present, approximately 60 pupils use the morning bus service. The School are also currently looking at the possibility to provide an evening bus service for pupils which will help to further reduce the traffic generated by the school. In addition, if the site at Orchard Close were to provide additional boarding facilities, this could potentially further help to reduce the traffic generated on a daily basis to and from the school site.

- 4.5 Criterion b) and c) require the school's master plan to incorporate a landscape and design strategy and a strategy for the historic fabric and archaeology. Twyford School endeavour to ensure any future development proposals both enhance and respect the landscape and the history fabric and archaeology on the school site. Twyford School are extremely proud of their history and are always looking to retain and enhance this where possible, especially the main school which is a Grade II Listed Building and has been since 1955. Testaments to Twyford School's commitment to preserve the school's history include the chapel within the main preparatory school has been preserved for generations. Other traditions such as court cricket has thrived over the years and will always be part of Twyford School's history. As such, Twyford School do not believe there is a need for a masterplan to reiterate the school's existing ambitions.
- 4.6 With regards to Criterion 3), we believe this to be overly restrictive as currently worded. Instead, we believe that the location of any new buildings on the school site outside of the main built up area should be informed by a Landscape and Visual Appraisal to ensure they are located in a landscape led manner.
- 4.7 In summary, Twyford School support policy BE3 and its intentions to allow the school to develop in response to changing demand.

## 5.0 Conclusion

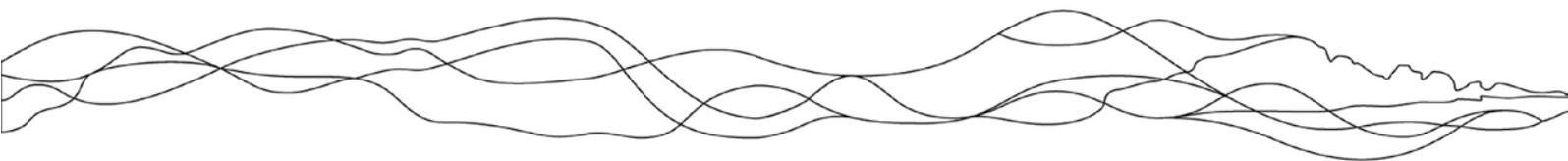
5.1 Twyford School are largely supportive of the TNP and its aspirations. The school has sought to engage with the Neighbourhood Plan Group and has responded to the various consultations throughout the TNP's preparation and feel as though some of their comments have helped to shape the TNP and its policies.

5.2 However, as set out above, Policy HN7 has been introduced since the Pre-submission TNP Consultation and as such as currently drafted, we believe that it does not contribute to achievement of sustainable development as set out in Section 2 of the NPPF and it is not in general conformity with the strategic policies of the South Downs National Park Local Plan. Therefore, at present the TNP fails to meet basic conditions d. and e. of the basic conditions that a draft neighbourhood plan or Order must meet if it is to proceed to referendum (Planning Practice Guidance - Paragraph: 065 Reference ID: 41-065-20140306). Notwithstanding this, we believe that this could easily be remedied by reviewing the policy in accordance with our comments set out at paragraph 2.7 to ensure Policy HN7 is not onerous or overly restrictive.

5.3 In conclusion, we request that the inspector takes on board all of the comments set out above in these representations and in particular looks at the following:

- Challenges the amended settlement boundary in the TNP in terms of the non-evidence based approach;
- Seeks to amend criterion 2 of Policy HN7 to read “*The change of use or redevelopment of Orchard Close to residential or other suitable use will be permitted provided:*” and all references to the need for an elderly care facility are removed; and
- Seeks clarity on the requirement of the Twyford School Master Plan and looks to reword some of the criterion as necessary.

Respondent Reference:	R12
Organisation or Individual:	Historic England
Agent Details:	N/A





Neighbourhood Planning  
South Downs National Park Authority  
South Downs Centre  
North Street, Midhurst,  
West Sussex, GU29 9DH

Our ref: PL00655322

[neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk)

by email only

25<sup>th</sup> March 2021

To whom it may concern:

### **Twyford Neighbourhood Plan Submission Version Consultation**

Thank you for consulting Historic England on the submission version of the Twyford Neighbourhood Plan 2019-2033. Historic England's remit is for the historic environment, including promoting the conservation and enjoyment of heritage assets and the championing of good design in historic places. As such our comments are restricted to those areas of the plan that affect our interest and silence on other matters should not be taken as agreement. We hope our comments are of assistance to the examiner.

We consider that the Vision and Objectives of the plan conform to paragraph 29 of the National Planning Policy Framework: "*Neighbourhood planning gives communities the power to develop a shared vision for their area*". We welcome the revision of Objective 5 in response to our comments and the addition of a specific objective for the conservation and enhancement of the character and appearance of Twyford Conservation Area and the significance of heritage assets in the parish. These objectives will guide the delivery of heritage policies included in the Neighbourhood Plan and will ensure that proposed policies deliver the Plan's objectives and are robustly justified.

### **Policy HN2 & Policy DB1**

For ease of reading and application of development plan policy we recommend that policies HN2 and DB1 are unified as a single policy. At present the division of the policy into two serves no purpose and is confusing.

We note that the Plan intends to allocate Site 26 which lies partly within and partly adjacent to Twyford Conservation Area. We consider that the potential negative



impact on heritage and the mitigation and enhancement measures identified in the Sustainability Appraisal have not translated fully into the Purposes and Policies of the plan that address site selection. Policy HN2 does not contain sufficient detail on how the conservation area will be affected nor does it include requirements to avoid or minimise harm or direction to how this should be achieved.

We note the statement in the Strategic Environmental Assessment that potential negative impacts to the conservation area resulting from development of the site could be mitigated through careful design appears to be based on an assessment that harmful impacts would not result in 'substantial harm' (See paragraph 6.27). However, the NPPF requires that great weight is given to the conservation of designated heritage assets "*irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*" (NPPF, para. 193). As such we feel the comment in the SEA at this point is unsubstantiated. Without clearly setting out how proposals should avoid or minimise the potential for harm to the character or appearance of the conservation area, either directly or through change within its setting, we feel that at present the policy does not promote sustainable development.

We note that a paragraph on landscape mitigation has been added to Policy DB1's supporting text. It proposes the retention of the tree clump on high ground in the centre of the site but it is not clear why this feature is significant and how it will be maintained. To ensure the Policy at DB1.d to retain this clump is enforceable we recommend that it is clearly identified on the proposals map. Policy DB1 makes no reference to views to and from the conservation area and how these will be protected through appropriate design, layout and materials. Paragraph 125 of the NPPF states that: "*Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.*"

The SA/SEA includes a recommendation that mitigation of potential effects on the conservation area should be set out in an addition to this policy requiring:

"Ensure that views from within the conservation area are protected through the appropriate design and layout of the development and the use of muted tones for building materials."

We feel this would be an appropriate requirement given the role of the land in the green setting of the conservation area and as greenspace within it. However, a more specific and directive wording to guide design would provide greater clarity. Whilst we would recommend engagement with the National Park Authority's conservation advisor in formulating a requirement we would suggest requiring the provision of



views from the conservation area through green open space to the wider rural setting as part of the layout of development, to protect the contribution of the wider countryside setting to the character or appearance of the conservation area and the restriction of development fronting Hazeley Road to two storeys with a set back from the road including front gardens to reflect the character of development facing it on the south side.

The allocated site is adjacent to areas identified in the Plan as having particular archaeological interest; however, it is not clear whether the potential for impacts on non-designated heritage assets recorded on the Hampshire Historic Environment Record has been assessed.

Without further analysis of the potential impact on heritage assets, including non-designated heritage assets, we would consider Policies HN2 and DB1 to be insufficiently detailed to adequately support the Plan's objectives for the historic environment and achieve sustainable development.

### **Policy DB2**

The policy's supporting text should explain why Stacey's garage is out of keeping with the conservation area and should provide a locally specific direction for the design of new buildings to ensure the policy is clear and implementable. Paragraph 16 of the National Planning Policy Framework requires that plans "*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*".

### **Policy DE1**

We are pleased that Policy DE1 on the design of development has been revised and now references specific documents to be used in identifying local distinctiveness and other design characteristics.

### **Policy LHE2**

We support the intention of the policy to protect locally significant views that contribute to the character and distinctive feel of Twyford Parish and we welcome the inclusion of a Landscape Character Assessment in the evidence base of the plan. We are disappointed that the opportunity has not been taken to provide a little more information on these views and how they contribute to the significance of heritage assets in order to make the policy more directive and adequately inform its implementation.



## Policy LHE3

We are pleased that the policy's supporting text has been redrafted to include a section that addresses non-designated heritage assets. We also note the reference to the evidence base of the plan which explains how areas of "archaeological potential" and "significant heritage assets" were identified. However, the wording of clauses 1. and 2. of Policy LHE3 suggests that only these areas are covered by the policy rather than all heritage assets within Twyford Parish and this requires clarification. The policy's supporting text unnecessarily repeats the provisions of the NPPF on archaeological investigations and does not set out specific provisions for the conservation of archaeological remains of interest during the planning process. We consider that to support delivery of sustainable development Policy LHE3 should require that, where a development has the potential to affect heritage assets of archaeological interest, a programme of archaeological investigation to be completed prior to submission of a planning application to inform design and allow for preservation of remains in-situ where merited, and by record where their loss is justified by the public benefits that would not otherwise be delivered.

Clause 3. of Policy LHE3 states that "historic buildings" should be preserved for their "collective contribution to the natural beauty of the SDNP". In our view, the existing wording would not represent an enforceable development control policy and, as such, we would like to suggest the following amended wording:

"Twyford's designated heritage assets and their settings will be expected to be protected, conserved and, where practicable, enhanced where they would be affected by development proposals.

Proposals for development that will result in the loss of, or harm to a non-designated heritage asset will not be supported, unless it can be demonstrated that the benefits of the development outweigh the loss of significance of the asset and cannot otherwise be provided in a less harmful manner."

## Policy LHE4

We welcome the intention to provide a specific policy for the protection and enhancement of Twyford Conservation Area and we are pleased with the intention to review the current designation and provide detailed guidance to inform new development. However, at present this statement does not amount to a planning policy in itself, but merely refers to the policies to be found elsewhere. As such it appears that the plan has not provided a clear vision for the future management of the conservation area that would achieve the plan vision or objectives.



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 Facsimile 020 7973 3001  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
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## Policy MA6

We support Policy MA6 which is a commendable recognition of local character detail and we welcome the description of the special characteristics of historic rural roads and the inclusion of a map showing their location within the Parish.

We hope these comments are of assistance to the examiner but would be pleased to answer any queries relating to them or provide further information if necessary.

Thank you again for consulting Historic England.

Yours faithfully,

Bozhana Pawlus

**Bozhana Pawlus, MSc (Hons.), BA (Hons.)**

Business Officer, London & South East

Regions Group

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Historic Places Adviser, South East England

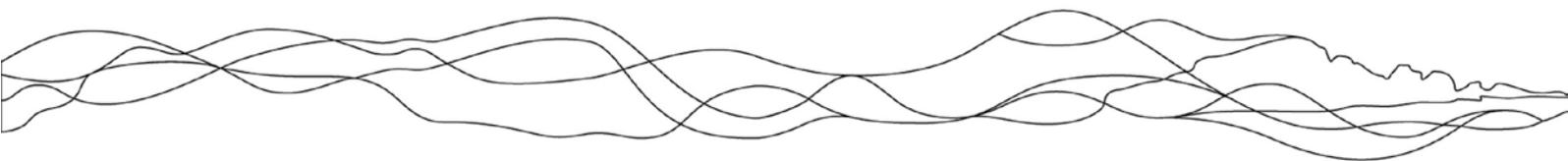


Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
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Correspondence or information which you send us may therefore become publicly available.



Respondent Reference:	R13
Organisation or Individual:	ProVision
Agent Details:	N/A



# **TWYFORD NEIGHBOURHOOD PLAN 2019 TO 2023**

Submission version, December 2020

Prepared by Pro Vision on behalf of The Humphrey Group

March 2021

**SUBMISSION VERSION, DECEMBER 2020**

TWYFORD NEIGHBOURHOOD PLAN 2019 TO 2013

PROJECT NO. 50801

**PREPARED BY:**

JAMES ILES

DIRECTOR

**DATE:**

MARCH 2021

**PRO VISION**

THE LODGE

HIGHCROFT ROAD

WINCHESTER

HAMPSHIRE

SO22 5GU

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APPENDICES

Appendix A –Pre-submission representations on behalf of The Humphrey Group

Appendix B – Planning Permissions at Hazeley Enterprise Park (Drawing 50801 SK1- 01)

## **1.0 Introduction**

- 1.1 On behalf of The Humphrey Group, we write to make representations on the submitted Twyford Neighbourhood Plan (TNP).
- 1.2 The Humphrey Group is the landowners of Northfields Farm and Hazeley Enterprise Park, including the land identified as Site 1 in the consideration of housing site options, and is therefore a key stakeholder in the TNP. As such, on its behalf, we have engaged with the preparation of the TNP at each of the previous stages.
- 1.3 We are keen to support the production of a sound and positive Neighbourhood Plan, and welcome the consideration that has been given to our previous representations.
- 1.4 However, we continue to have some significant objections to parts of the TNP as now submitted to the South Downs National Park Authority ahead of the independent examination, some of which we consider warrant public hearings with the Examiner.

## 2.0 Repetition of Local Plan and national policy

- 2.1 We continue to have concerns, raised at the Pre-submission stage and acknowledged in the TNP response (undated), that several of the proposed policies are duplicating policy of the Development Plan, but without providing a “additional level of detail and/or a distinctive local level approach”<sup>1</sup>. In which case, the policies in question are not in accordance with the General Conformity test.
- 2.2 We also note that SDNPA raised similar concerns in its Pre-submission representations.
- 2.3 We note and welcome that some of the policies we raised concerns about previously have been amended so that they now have a local detail to justify their inclusion in the TNP (provided they do not otherwise undermine the higher-level policy). For example, policy WE1 (Flood Risk Management of the water environment).
- 2.4 Policy SS1 (Renewable energy) has been amended significantly since pre-submission consultation. While the ‘Final’ version now has a local detail – assertion that the local landscape is less suitable for wind turbines and solar arrays – it is not clear where the evidence is to support this significant amendment and blanket ban on these types of renewable energy schemes across the NP Area. Restricting the higher-level policy position for the National Park (Policy SDLP 51) does not appear to have been justified. The amended policy remains problematic.
- 2.5 In regard to Policy SS2 (Sustainable and Adaptable Buildings), there appears to be a presentational issue in that the actual policy wording (usually presented in a green inset box) is missing. Assuming the policy wording is the final paragraph of page 62, we would note that this appears to be a duplicate policy without a justified local application.
- 2.6 Nevertheless, the submitted TNP still includes several ‘duplicate policies’, including (but not necessarily to) the following policies:

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<sup>1</sup> Paragraph: 074 Reference ID: 41-074-20140306 Revision date: 06 03 2014

- Policy LHE6 (Local biodiversity, trees and woodlands) (formerly Policy LHE5);
- Policy LHE7 Dark Night Skies (formerly Policy LHE6).

### 3.0 Housing Policies

- 3.1 In regard to the approach to housing, we wish to rely on the representations made at Pre-submission stage<sup>2</sup>, which in summary are that there are two sites that have been identified as potentially suitable for allocation to meet the housing targets provided by the Local Plan, but it is not clear that the evidence supports the selection of S26 over Site 1, nor does it indicate that two sites would be unsustainable or otherwise inappropriate.
- 3.2 Indeed, the evidence base shows that S26 is only of similar sustainability performance to S1 only once mitigation is factored in; i.e. S1 is the better performing option, including in terms of landscape impact and does not rely on mitigation to make it acceptable<sup>3</sup>.
- 3.3 Dismissal of the alternative option of allocating both sites to meet the identified Local Housing Need (a higher figure than the allocation from the Local Plan) appears to have been dismissed prematurely noting that S26 is preferred subject to mitigation but S1 is less constrained including in terms of the significant issues of landscape and heritage impacts.
- 3.4 The key factor in selecting 26 over S1 appears to be the level of community benefits that can be delivered directly by the former and not the latter<sup>4</sup>. On the basis that S1 is better performing overall, but there is hope for specific community benefits to be delivered from S26, and noting the Local Housing Need is greater than 20 homes allocated from the Local Plan, there is clear justification for allocation of both sites.
- 3.5 Allocation of both sites to meet the Local Housing Need in full, would accord with the key objective of national policy to boost significantly the supply of homes (NPPF paragraph 59). It would also spread the benefits of development, including affordable housing, more widely noting that the two sites are in different parts of the village.
- 3.6 Further, as we have previously noted, it would de-risk the Plan by avoiding over-relying on one site to deliver the local need when these are acknowledged to be significant constraints and

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<sup>2</sup> Our Pres-submission representations are reproduced at Appendix A for convenience.

<sup>3</sup> Sustainability Appraisal of Twyford Neighbourhood Plan: Pre submission July 2019 Draft

<sup>4</sup> Sustainability Appraisal of Twyford Neighbourhood Plan: Pre submission July 2019 Draft; paragraph 6.37.

there is understood to be uncertainty over who has control of the land. Whereas Site 1 is less constrained and is under the full control of the Humphrey Group, increasing its prospects of timely delivery.

## 4.0 Employment policies

### ***Policy BE1 Employment and Business Provision***

- 4.1 We continue to have concerns over the supporting text, which continues to state *“In Twyford there is no need for further employment and its encouragement would simply draw more people in from the outside”*<sup>5</sup>. As we have stated in previous representations, this stance that the TNP is taking on employment appears to be at odds with the NPPF (paragraphs 83 and 84) and SDNPA policy SD34.
- 4.2 Likewise, we continue to have concerns that the supporting text states: *“...the expansion or intensification of other commercial premises, whether of sites or building, is resisted”*<sup>6</sup>. This is again contrary to higher level policy.
- 4.3 Equally, in regard to the wording of the policy itself, noting the lack of amendment in the Submission Version, we continue to have concerns that it is not in general conformity with national and Local Plan policy and is instead seeking to reinterpret those policies in a more restrictive way for the TNP area, rather than adding local level detail.
- 4.4 Overall therefore, while some positive amendments have been made to the supporting text of this policy, which is welcomed, there are still some significant conformity issues.

### ***Policy BE2 Northfields Farm and Hazeley Enterprise Park***

- 4.5 We have made comprehensive representation on drafts of this policy previously and note that, while some amendments have been made, many of the concerns have not been addressed in the Submission Version and therefore we maintain objection to this policy.
- 4.6 It is noted and welcomed that draft Policy BE2.2 (relating to the Care Home permission) has been deleted following our representations, and also those of SDNPA.

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<sup>5</sup> TNP Page 25.

<sup>6</sup> TNP Page 25.

- 4.7 In respect of the supporting text, it is noted that a new paragraph is included since the Pre-submission version<sup>7</sup>. This raises significant general conformity issues by explicitly constraining Local Plan policy SD34. The new assertion that this is justified so that individual businesses cannot “expand on an individual basis” runs contrary to national policy as well, which seeks to promote a prosperous rural economy (paragraphs 83 and 84). It is in direct conflict with NPPF paragraph 84, which promotes use of previously developed land “where suitable opportunities exist”. This should be tested through the planning system rather than a blanket restriction on business expansion introduced through the TNP.
- 4.8 We reiterate concerns expressed at Pre-submission stage that it is inappropriate and not consistent with Local Plan policy to seek to introduce a master plan for the site. A master plan would only be appropriate for a comprehensive redevelopment of the estate, not a retrospective master plan to seek to “regularise” issues that have, in any case, been addressed through various planning applications and legal agreements.
- 4.9 It is understood that a master plan for the site has been an ambition of the Parish Council for some time. While policy MTRA5 of the Local Plan encourages master plans for “major commercial and educational establishments” in “sensitive rural locations”, the requirement is expressly stated as “prior to development”.
- 4.10 At Hazeley Enterprise Park, now identified as a Special Policy Area on Map 6, there are already three major and extant planning permissions that cover the development of the site (Appendix B). These have all been through the statutory planning process, and are subject to planning controls, through conditions and legal agreement.
- 4.11 Notwithstanding the lack of justification for a master plan in this case, it is noted that the TNP is seeking to rely on the site owner rather than the SDNPA to deliver a master plan. However, the site owner cannot adopt a master plan unilaterally, and it would of course have to be subject to public consultation and scrutiny by Officers, Members and other stakeholders. Only where there was the prospect of significant development over the Plan period – that has not already been subject to planning control – is such effort and expense warranted.

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<sup>7</sup> Shown in blue text in the Amended TNP December 2020.

- 4.12 Therefore, our concern remains that as well as being an unreasonable policy requirement, given this is an established development area and has three extant permissions, it is placing unnecessary burden on the local authorities.
- 4.13 It is also relevant to distinguish the site (and policy BE2) from the Twyford Preparatory School (policy BE3). The School is understood to already be in discussions with the Parish Council about a master plan to guide its future development ambitions. No such discussions have taken place regarding with Northfields Farm/ Hazeley Enterprise Park, and as already explained, the site has been and is subject to planning controls associated with the three major extant permissions.
- 4.14 We reiterate our concerns that this requirement for a master plan is not in conformity with the Local Plan, namely policy SD5 and there is no certainty about how any master plan would be scrutinised, who would approve or refuse it, and what status, if any, it would have in the planning system.
- 4.15 Noting that the site is already subject to three major planning permissions, and also that the area is now under the policy of the National Park Authority, a ‘Whole Estate Plan’ (WEP) (policy SDNP25), would perhaps be a more appropriate route for what the TNP appears to be seeking to achieve, i.e. coordination of a diverse range of commercial activities in a dynamic commercial environment, hence its passing reference to Local Plan Policy SD 25(3). . However, these are generally aimed at large countryside estates of more than 400 acres, whereas the Enterprise Park is approximately 14 acres (or 5.5 hectares) albeit within a wider landholding<sup>8</sup>.
- 4.16 Nevertheless, scale is not the only factor, and a WEP would be a more appropriate vehicle for addressing general objectives (although not issues such as “hours of working” which are controlled at planning application, contrary to the assertion of the proposed criteria of Policy BE2.1 (b) that these are master plan matters).
- 4.17 We reiterate objection to the policy seeking to constrain any new development at this ‘local employment site’ to removal of the existing mill business. This is a matter controlled in respect

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<sup>8</sup> Whole Estate Plans Preparation Guidelines: Background, Content and FAQs. South Downs National Park(Issued 02.12.15)

of a specific extant planning permission and associated legal agreement. It is inappropriate for the TNP to seek to widen these existing controls to bind any other development. The implications of the policy as put forward in Submission Version, despite our previous submissions, is that any of the existing businesses in this employment area could not change use until such time as the mill is removed. That is a very unreasonable constraint and liable to put businesses or new business opportunities at risk, not least in the prevailing difficult economic circumstances following the global health pandemic. In amending the Use Classes Order in September, the government is clearly seeking to introduce greater flexibility to support the economy. As submitted, the TNP is pushing the other way.

- 4.18 Finally, we have concerns regarding the third criterion listed as justification for encouraging alternative commercial uses in the event that the permitted care home is not implemented is inappropriate as it is too vague and is unsubstantiated: what are the “multiple drawbacks” of “non commercial uses”?
- 4.19 Overall, while it is supported that the Enterprise Park is identified as a key existing land use and the TNP is justified in having a site-specific policy (hence our support expressed in previous representations for policy SB2: Development outside the settlement boundary), the policy as put forward continues to be problematic, not least in respect of the vague and unjustified requirements for a master plan which appears to be seeking to rewrite established planning controls.
- 4.20 The strength of our objections to the detail of Policies BE1 and BE2, which have been consistent through the plan making process, warrants a public hearing session with the Examiner.

## 5.0 Other policies

### ***Policy MA4 Access to Northfields Farm/Hazeley Enterprise Park***

- 5.1 We have made representations expressing concerns about the accuracy of the supporting text of this policy and indeed questioned whether it should be included in the TNP at all.
- 5.2 Notwithstanding these concerns, we do not necessarily object to the actual policy which clarifies support for the principle of an alternative access to the Enterprise Park, which could assist with reducing heavy vehicle traffic through the village
- 5.3 While the supporting text claims that such a route would provide environmental benefits for the village, inclusion of a new road in the National Park will of course require careful assessment, not least in terms of landscape and biodiversity impact. We note, however, that SDNPA is silent on the policy in its comments on the Pre-submission TNP.
- 5.4 New infrastructure of this nature would normally only be feasible as part of facilitating new development.
- 5.5

### ***Policy PO1 Pollution and Contaminated Land***

- 5.6 Our previous representations on this policy do not appear to have entirely been understood judging by the amendments to the supporting text. It is still not clear how the assertion that odour from the mill is a main source of pollution is evidenced rather than anecdotal.
- 5.7 New reference to nitrates pollution in the Submission Version is noted. However, this should be in accordance with evolving guidance from Natural England, which seeks nitrate neutrality for all residential and overnight accommodation in the Solent catchment<sup>9</sup>. As submitted, this policy is widening this constraint to all developments.

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<sup>9</sup> Advice on achieving nutrient neutrality for new development in the Solent Region, Natural England, March 2020 (Version 4).

## **6.0 Conclusion**

- 6.1 The Humphrey Group is keen to support the Parish Council in its objective of producing a positive local policy framework for the village. It has engaged at each stage of the preparation of the TNP.
- 6.2 While it is welcomed that many of the comments made at the previous stages have led to positive amendments and clarifications to the content of the Plan, we continue to have significant objections to some key aspects, including the detail of the site-specific policy for Hazeley Enterprise Park (Policies BE1 and BE2) and for how the preferred housing site has been selected against the alternative options (Site 1 or both S26 and S1).
- 6.3 In general, we continue to have concerns that many of the policies are not in general conformity with the higher level policy.

## Appendix A –Pre-submission representations on behalf of The Humphrey Group



# DRAFT TWYFORD NEIGHBOURHOOD PLAN

## PRE-SUBMISSION CONSULTATION - COMMENTS FORM



**Please return no later than 24<sup>th</sup> February 2020 via:-**

**E-mail: [twyfordneighbourhoodplan@gmail.com](mailto:twyfordneighbourhoodplan@gmail.com)**

**Post: Twyford Parish Clerk, PO Box 741, Winchester SO23 3QA**

**Drop off: In collection boxes at Twyford General Stores and Twyford Social Club**

Twyford Parish Council has commenced a six-week pre-submission consultation on the Draft Twyford Neighbourhood Plan. This is the last time we will be asking people for comments on the policies before submitting the Plan to South Downs National Park Authority (SDNPA) for an examination by an Independent Examiner.

An exhibition of the Plan and supporting documents will be held at Twyford Social Club on Thursday 23<sup>rd</sup> January (4 – 8 pm) and Saturday 1<sup>st</sup> February (10 am – 4 pm) 2020.

The Draft Plan and supporting data can also be viewed online at **[www.twyfordneighbourhoodplan.com](http://www.twyfordneighbourhoodplan.com)**

Paper copies of the Draft Plan will also be available for viewing, throughout the consultation period at The Gilbert Room, Twyford Surgery, Bugle and Phoenix Inns, Twyford Social Club, Twyford General Stores, Bean Below and St.Mary’s Church.

All comments submitted by **24th February 2020** will be considered by the Parish Council and may be utilised to amend the Draft Neighbourhood Plan. A Consultation Statement including a summary of all comments received and how these were considered will be published and submitted to SDNPA along with the amended Neighbourhood Plan.

***Please note we will not accept responses that are anonymous and comments may be made public, but not your personal details.***

Responses will be acknowledged.

Updates on the Plan will be provided on the Twyford Information system (TIS). If you are not already on TIS you can register through the Parish Council website at <https://www.twyfordhants.org.uk> or through the “your views” tab at [www.twyfordneighbourhoodplan.com](http://www.twyfordneighbourhoodplan.com)

Thank you for your comments and support in preparing the Twyford Neighbourhood Plan.

*Please print details:*

<b>Title</b>	Mr
<b>First Name</b>	James
<b>Last Name</b>	Iles
<b>Organisation</b> <i>(If Applicable)</i>	Pro Vision
<b>Representing</b> <i>(If Applicable)</i>	The Humphrey Group
<b>Address including postcode</b>	Grosvenor Court Ampfield Hill, Ampfield Romsey Hampshire SO51 9BD
<b>Telephone</b>	01794 368698
<b>Email</b>	jamesi@pro-vision.co.uk

Draft Policy Ref No.	Draft Policy Title (below is a list of policies within the Neighbourhood Plan to help identify for the comments box on the following page)
SB1	Settlement policy boundary
SB2	Development outside the settlement boundary
HN1	Local housing needs & housing mix
HN2	Housing provision
HN3	Land for housing : site selection
HN4	Affordable provision on allocated & windfall sites
HN5	Exception sites
HN6	Housing – New proposals within the settlement boundary
HN7	Housing in the countryside
HN8	Orchard Close (Abbeyfields)
BE1	Employment & business provision
BE2	Northfields Farm & Hazeley Enterprise Park
BE3	Twyford Preparatory School
ST1	Visitor and tourism facilities
ST2	Visiting and enjoying Twyford
CP1	Open spaces
CP2	Community assets
CP3	St Mary's Primary School
LHE1	Protected gaps
LHE2	Landscape and views
LHE3	The historic environment, buildings & archaeology
LHE4	Green infrastructure
LHE5	Local biodiversity, trees and woodlands
LHE6	Dark night skies
WE1	Flood Risk Management
WE2	Foul Sewerage including surcharging
MA1	Walking & cycling
MA2	Parking
MA3	Minor traffic management improvements
MA4	Northfields Farm / Hazeley Enterprise Park
MA5	Transport in the Parish
MA6	Historic rural roads
SS1	Micro generation and renewable energy
SS2	Sustainable and adaptable buildings
PO	Pollution and contaminated land
DE1	Design
IDC1	Infrastructure & developer contributions
DB1	Land adjacent to the Parish Hall (Site 26)
DB2	Housing allocation: Stacey's Garage

**Comments**

*Where possible, please indicate to which policies of the Draft Neighbourhood Plan each comment relates. We would welcome general comments but are particularly interested in any comments you may have on the policies which will set the controls for development over the life of the Plan. Please use a continuation sheet if required.*

**Policy Ref  
or page  
and  
paragraph**

**Comments**

Please see the attached covering letter and comments prepared on behalf of The Humphrey Group.

**Date 24.02.2020**

Our ref: KS/JI/ 50801



Twyford Parish Clerk  
PO Box 741  
Winchester  
S023 3QA

Sent by email only to: [twyfordneighbourhoodplan@gmail.com](mailto:twyfordneighbourhoodplan@gmail.com)

24 February 2020

Dear Sir/ Madam

**Response to the Pre-Submission Draft Twyford Neighbourhood Plan, November 2019.**

On behalf of our client, The Humphrey Group, we write to provide comment on the draft Twyford Neighbourhood Plan. The Humphrey Group are the landowners of Northfields Farm and Hazeley Enterprise Park and are therefore key stakeholders in the Neighbourhood Plan.

Our comments are set out in the attached table, with clear cross-reference to the part of the draft Plan that we are commenting on.

In summary, we consider that the draft Plan requires significant amendment if it is to meet the Basic Conditions for Neighbourhood Plans and be able to proceed to referendum. We have concerns that some of the draft policies are seeking unduly to overwrite existing planning permissions for the Hazeley Enterprise Park. As set out in our comments, we also consider that there is opportunity for the draft Plan to make a more positive contribution to meeting the identified local housing need.

We trust that these comments will be given due consideration and that the submission version of the Plan will reflect our views. Finally, we also note that the Neighbourhood Plan website requires amending to clarify that it is only the comments submitted at the next stage of consultation, run by South Downs National Park Authority, that will be forwarded to the independent examiner.

Your faithfully,

A handwritten signature in black ink, appearing to be 'J. Iles'.

**James Iles MRTPI**

Director

[jamesi@pro-vision.co.uk](mailto:jamesi@pro-vision.co.uk)

cc. Jonathan Humphrey, Group MD, Humphrey Farms Ltd  
Sarah Andrews, Property Director, Humphrey Farms Ltd.

Enc: Table of comments on Pre Submission Draft Policies and supporting text.

References

TNP: Twyford Neighbourhood Plan

SDLP: South Downs Local Plan

SDNPA – South Downs National Park Authority

NPPF – National Planning Policy Framework 2019

NPPG – National Planning Policy Guidance

SA – Sustainability Appraisal (Incorporating Strategic Environmental Assessment) Pre-submission draft 14/11/2019

Strike through text is text that we recommend is deleted.

Text in bold italics is proposed new text.

<b>Section: Policy/paragraph/Figure reference</b>	<b>Extract from TNP</b>	<b>Comment</b>	<b>Recommended amendments</b>
<b>General comments</b>			
	General	The document lacks paragraph numbering, therefore, is difficult to cross-reference.	Add paragraph numbers in future revisions.
	General	Many of the draft policies repeat higher level policies (the SDLP) and therefore it is doubtful that they conform with the basic conditions test for Neighbourhood Plans.	Review draft policies and remove or amend policies that only repeat higher level policy, or stray outside of material planning issues.

			<p>We note that the following examples are likely to fall into this category, and have therefore not commented further on their detail:</p> <ul style="list-style-type: none"> <li>• Policy LHE5 Local biodiversity, trees and woodlands</li> <li>• Policy LHE6 Dark night skies</li> <li>• Policy WE1 Flood Risk Management of the water environment</li> <li>• Policy WE2 Foul Sewerage including surcharging</li> <li>• Policy MA3 Minor traffic management improvements</li> <li>• MA5 Transport in the village</li> <li>• Policy MA6 Historic Rural Roads</li> <li>• Policy DE1 Design</li> <li>• Policy IDC1 Purpose of the Policy &amp; Infrastructure and Developer Contributions</li> <li>• Policy SS1 – Renewable energy</li> <li>• Policy SS2 - Sustainable and adaptable buildings.</li> </ul>
<b>Objectives of the Plan</b>			

	Objective 2: “To enhance a vibrant and thriving community life, by providing new housing to meet local needs, promoting employment and supporting retail, community and sports provision”.	<ul style="list-style-type: none"> <li>• The objectives of the TNP are generally supported, especially Objective 2.</li> <li>• The TNP provides opportunity to meet local needs over and above those identified in the SDLP.</li> <li>• Humphreys Group is already the major employer in the parish and best able to sustain and provide further employment opportunities.</li> <li>• It is also owner of Site S1, which is the best performing housing site in the evidence base (notably the SA).</li> </ul>	Further review of the draft policies against the TNP’s objectives, as there are instances (highlighted below), where policies appear to contradict them.
<b>BE- Employment and business provision</b>			
BE1- Employment and business provision  Supporting Text:  <i>Purpose of the Policy</i>	<i>“The biggest concentration of firms (27) is to be found at Hazeley Enterprise Park/Northfields Farm”</i>	<ul style="list-style-type: none"> <li>• There are currently 18 businesses at the enterprise Park including the Humphrey Group. Business numbers do change over time and therefore this is a snapshot only.</li> </ul>	<i>“The biggest concentration of firms <del>(27)</del> (currently 18) is to be found at Hazeley Enterprise Park/Northfields Farm”</i>
	<i>“The 78% of Twyford residents working outside the Parish have a huge range of employment choices within easy reach, in the urban centres of Winchester and South Hampshire, many commute to London. This pattern of working has been confirmed by a survey of local firms and employers carried out in 2016 by TNP”.</i>	<ul style="list-style-type: none"> <li>• Plan uses 2011 Census figures, now nearly 10 years old, and makes assumptions about those working outside of the village.</li> </ul>	<ul style="list-style-type: none"> <li>• More up to date ONS figures should be used if available.</li> <li>• It should be recognised that 22% of people living and working in the village is comparatively high compared to other settlements, and therefore</li> </ul>

			<p>Twyford actually has a good level of self-sufficiency, thanks in part to the job opportunities provided by Hazeley Enterprise Park.</p>
	<p><i>“There is an outstanding consent for a 131 bed care home and commercial buildings to replace the Feed Mill at Northfields Farm and a further consent granted in 2017 for the redevelopment of existing land and buildings at Northfields. These could add about three hundred jobs to the Parish and provide for the expansion of existing firms and for new ones”.</i></p>	<ul style="list-style-type: none"> <li>• Support in general but detail should be amended. It is misleading to quote precise employment figures, which are at best speculative. The net gain in jobs is significantly less than this would imply. Therefore, we suggest the reference to 300 is deleted.</li> </ul>	<p><i>“There is an outstanding consent for a 131 bed care home and commercial buildings to replace the Feed Mill at Northfields Farm (08/02924/OUT &amp; SDNP/14/05196/REM &amp; SDNP/16/04628/COND) and a further consent granted in 2017 for the redevelopment of existing land and buildings at Northfields (SDNP/17/02639/FUL). These could add <del>about three hundred</del> jobs to the Parish and provide for the expansion of existing firms and for new ones”.</i></p>
	<p><i>“In Twyford there is no need for further employment and its encouragement would simply draw more people in from outside.”</i></p>	<ul style="list-style-type: none"> <li>• The statement appears to completely contradict TNP Objective 2, which includes “promoting employment”.</li> <li>• Amend to state that the village is already well-served by employment opportunities notably through Hazeley Enterprise Park.</li> <li>• For consistency with national<sup>1</sup> and local policy, amend so that the Plan is not prevented more rural employment but rather making the</li> </ul>	<p><b><i>“Given the existing employment potential at Hazeley Enterprise Park and Northfields Farm, <del>in</del> Twyford is already well served by employment opportunities therefore there is no need for further employment sites to be allocated but other ‘windfall’ opportunities may be available through conversion, upgrading and redevelopment of existing properties and sites helping to strengthen and sustain the local rural economy. <del>and its</del></i></b></p>

<sup>1</sup> NPPF Paragraphs 83 and 84 (Supporting a prosperous rural economy).

		<p>point that the village already benefits from significant employment opportunity.</p> <ul style="list-style-type: none"> <li>• The Plan might usefully express an aspiration for employment opportunities that are accessible to the local community, for example, provision of a range of skilled and unskilled work.</li> </ul>	<p><i>encouragement would simply draw more people in from outside."</i></p>
	<p><i>"In summary, while the expansion and redevelopment of businesses and employers serving the needs of the Twyford Community and land-based enterprises (e.g. farms, golf course etc.) are supported (subject to other requirements of the Plan), the expansion or intensification of other commercial premises, whether of sites or buildings, is resisted".</i></p>	<ul style="list-style-type: none"> <li>• Fails to acknowledge modern working practices such as working from home.</li> <li>• Not consistent with NPPF support for rural economy (NPPF Chapter 6) and making efficient use of previously developed land (NPPF Chapter 11).</li> <li>• Not in conformity with SDLP Policy SD34 which permits proposals that <i>"foster the economic and social wellbeing of local communities in the National Park including where it provides:</i> <ul style="list-style-type: none"> <li><i>e) 'flexibility for established businesses to secure future resilience and protect local jobs; and</i></li> <li><i>f) Intensify the commercial use of an employment site and make a more efficient use of brownfield land".</i></li> </ul> </li> </ul>	<p>Suggest delete paragraph as inconsistent with national and local policy.</p>

	<p><i>“Because of their size and importance in the Parish and their countryside location, Twyford Preparatory School and Northfields Farm/Hazeley Enterprise Park are subject to more detailed policies”.</i></p>	<ul style="list-style-type: none"> <li>• Support Northfields/ HEP reference as a key stakeholder/site in the local community.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>Supporting text:   <i>Relationship to the South Downs Local Plan</i></p>	<p><i>“Employment and business are encouraged by SDLP SD 34 in limited circumstances subject to their fostering “the economic and social well being of local communities. However, the evidence base for Twyford Parish shows firstly that the community is more than fully provided for in employment; that few of the businesses in the Parish provide services for the community and that recent outstanding consents provide the opportunity for expansion and modernization of existing firms, as well as new ones.</i></p> <p><i>Policies BE1, BE2 and BE3 apply the aims and objectives of the SDLP and of SD 34 and SD 35 in particular to the particular circumstances of Twyford Parish”.</i></p>	<ul style="list-style-type: none"> <li>• Where is the evidence for this assertion?</li> <li>• Hazeley Enterprise Park provides local services such as car servicing centre, florist, wine merchant which benefit and help to sustain the local community as well as serving customers elsewhere. A number of Twyford residents are employed here as well. There are therefore strong links between businesses at the Enterprise Park and the local community.</li> <li>• Whether recent outstanding consents provide the opportunity for expansion and modernisation of existing firms as well as new ones is irrelevant. This should not be a determining factor for other proposals coming forward.</li> </ul>	<p><i>“Employment and business are encouraged by SDLP SD 34 in <del>limited</del> <b>certain</b> circumstances subject to their fostering “the economic and social well being of local communities. However, the evidence base for Twyford Parish shows firstly that the community is more than fully provided for in employment; that few of the businesses in the Parish provide services for the community and that recent outstanding consents provide the opportunity for expansion and modernization of existing firms, as well as new ones.</i></p> <p><i>Policies BE1, BE2 and BE3 apply the aims and objectives of the SDLP and of SD 34 and SD 35 in particular to the particular circumstances of Twyford Parish”.</i></p>
<p>Policy BE1           Employment and business provision</p>	<p>1. Existing land and buildings in use for economic purpose are to be retained and will be subject to SD 35.2, other than DB2.</p>	<ul style="list-style-type: none"> <li>• Support the fact that key sites outside of the settlement policy boundary are addressed in the Plan.</li> </ul>	<ul style="list-style-type: none"> <li>• This draft policy should be comprehensively reviewed for consistency with higher level policy.</li> </ul>

	<p>2. <i>Within the settlement boundary, development, including change of use and redevelopment for economic purposes will be permitted.</i></p> <p>3. <i>Outside the settlement boundary excluding BE2 new development, redevelopment and expansion, whether of site area or buildings will be permitted in accordance with SD 34 and the uses specified in SD 34 (a-d and g). In other cases re-development will be permitted on a 'like for like' basis. Changes of use for commercial purposes will be permitted provided that no additional heavy traffic is generated.</i></p> <p>4. <i>In all cases, there should be no additional impact on historic rural roads”.</i></p>	<ul style="list-style-type: none"> <li>• However, as drafted Parts 1 and 2 of the policy largely duplicate the requirements of SDLP SD34 &amp; SD35.</li> <li>• Part 3 seeks to limit redevelopment and expansion proposals outside the settlement to uses in SD34a)-d) and g) only. This is not in conformity with SDLP SD34 and the purpose of a Neighbourhood Plan is not to constrain or alter higher level policy.</li> <li>• Part 4 requires there to be no impact on the historic rural roads in the Parish. Part 2 of policy SD35 requires development proposals to not adversely impact the wider landscape, including impacts relating to traffic, noise or pollution. The TNP duplicates SD35 and applies a more restrictive approach than SD35.</li> </ul>	<ul style="list-style-type: none"> <li>• HEP should be identified as mixed-use employment site.</li> </ul>
<p>Policy BE2</p> <p>Northfields Farm and Hazeley Enterprise Park</p> <p>Supporting text:</p> <p><i>Purpose of the Policy</i></p>	<p><i>“It is in single ownership and is in the process of being turned from an agri-industrial egg farm with offices, sheds and a feed mill to commercial uses”.</i></p> <p><i>“The site is home to about 27 firms”</i></p>	<ul style="list-style-type: none"> <li>• The agricultural uses ceased well over 10 years ago, therefore, inaccurate to reference site as an agri-industrial site; now a well-established and recognised mixed-use commercial site.</li> <li>• There are currently 18 firms including The Humphrey Group, amend to reflect this.</li> </ul>	<p><i>“It is in single ownership and <del>is in the process of being turned from an agri-industrial egg farm with offices, sheds and a feed mill to</del> is an established mixed-use commercial uses site, which for more than ten years now, has been in the process of upgrading to meet modern business accommodation needs”.</i></p>

			<p><i>"The site is home currently to about <del>27</del> 18 firms".</i></p>
	<p><i>"The mill and other land within this site have the benefit of several planning permissions; two have yet to be implemented. One is for redevelopment of the mill for further commercial space and a 131 bed space care home, with employment predicted to grow by over 200 people. This cannot be implemented until the mill has been removed with 2026 as its end date. A second more recent consent permits the development of additional land and buildings with redevelopment of commercial buildings; the area overlaps the care home consent. The consent is not tied to the demolition of the mill. It will generate a significant number of extra jobs".</i></p>	<ul style="list-style-type: none"> <li>• Factually incorrect. Suggest text is updated to accurately reflect current position.</li> <li>• It is misleading to quote precise employment figures, which are at best speculative. The net gain in jobs is significantly less than this would imply. Therefore, we suggest the reference to 200 is deleted.</li> <li>• The process of discharging the pre-commencement planning conditions is underway and there is every likelihood that the implementation of the planning permission will have lawfully started by the time the TNP is put to referendum.</li> </ul>	<p><i>"The <del>mill and other</del> land within this site have the benefit of several planning permissions <b>(referenced in the supporting text to this policy)</b>; <del>two have yet to be implemented</del>. One is for redevelopment of the mill for further commercial space and a 131 bed space care home, <b>both of which are expected to enhance employment opportunities at the site.</b> <b>The pre-commencement planning conditions for the mill site have been discharged and this permission has been lawfully commenced and therefore the permission is extant. The redevelopment of the site is controlled by planning conditions and a legal agreement. The legal agreement requires removal of the mill. The second more recent consent permits the development of additional land and buildings with redevelopment of commercial buildings; the area overlaps the care home consent. The consent is not tied to the demolition of the mill. Pre-commencement planning conditions have been discharged.</b> <del>It will</del></i></p>

			<p><i>generate a significant number of extra jobs.</i>  <b>Both permissions largely will replace existing jobs on the site though there is expected to be a net gain overall.</b></p>
	<p><i>“Consents have been granted on a piecemeal basis for different parts of the site and have failed to secure overall control of hours of working, traffic, cycle or pedestrian movement or landscaping”.</i></p>	<ul style="list-style-type: none"> <li>• We do not support this negative assertion.</li> <li>• Through the planning control process, each scheme has been considered comprehensively in the context of the existing development and extant permission at the Northfields Farm and Hazeley Enterprise Park site by the Applicants, SDNPA (both Officers and elected members at Committee) and other stakeholders, including the Environment Agency and the Local Highway Authority. Appropriate conditions and a legal agreement have been used to secure ‘control’ or mitigation of impacts of the development where necessary.</li> <li>• Given the mixed-use nature of the site an ‘overall’ control approach to matters such as working hours and traffic is inappropriate, unduly restrictive and unnecessary. Suggest this is deleted.</li> </ul>	<p><i>“Consents have been granted on a piecemeal basis for different parts of the site and have failed to secure overall control of hours of working, traffic, cycle or pedestrian movement or landscaping”.</i></p>

		<ul style="list-style-type: none"> <li>• It should be noted that the SA (para 6.52) considered having a restrictive approach to this employment site (and the Twyford School site) but advised that the Plan should not “unduly stifle employment opportunities in the parish”.</li> </ul>	
	<p>“The site is significant in National Park terms both for employment and for commercial use. It is dominant within the TNP in the provision of business space. Few of the jobs are filled by Twyford or South Downs area residents”.</p>	<ul style="list-style-type: none"> <li>• Welcome recognition of the site’s contribution to employment and commercial uses in the National Park.</li> <li>• However, attributing this to being ‘significant’ in the whole of the National Park is a value judgement which is unsubstantiated and imprecise. We suggest that it is referred to as an ‘established’ employment site and significant in the local community.</li> <li>• The last sentence is unsubstantiated, and it is not the role of the planning system to control where people live and work.</li> <li>• As noted in regard to the supporting text of the Business policies, the TNP could express an aspiration for improving the opportunities for local residents to work in the community, through for</li> </ul>	<p>“The <b><i>mixed-use commercial</i></b> site is significant in National Park <b><i>the dominant local employer in terms both for employment and for commercial use.</i></b> It is dominant within the TNP in the provision of business space. Few of the jobs are filled by Twyford or South Downs area residents”.</p>

		<p>example, encouraging a range of skilled and unskilled jobs.</p> <ul style="list-style-type: none"> <li>Supporting the mixed-use regeneration/upgrading opportunities at HEP is the most obvious way in which the TNP can help to encourage more employment opportunities to live and work in the parish.</li> </ul>	
	<p><i>“The site with its many buildings is on high ground to the north east of the village and is visible over a wide area from many vantage points. When the mill is demolished it is planned to be replaced by the care home, which will be prominent in the landscape. Proposals to reduce the impact of the care home on the landscape and on the village would be encouraged”.</i></p>	<ul style="list-style-type: none"> <li>The care home scheme has extant planning permission it is not for the TNP to revisit or opine on past planning decisions. The policy and supporting text should focus on guidance for potential future alternative proposals. We suggest that the second sentence is either deleted or amended to simply suggest that any future schemes for the site should continue to be sympathetic to the position of the site in the landscape and the context of the village.</li> </ul>	<p><i>“The site with its many buildings is on high ground to the north east of the village and is visible <b>from the surrounding area</b>. When the mill is demolished <b>any future proposals for the site should continue to consider the impacts on the landscape and views from surrounding public view points</b>’. <del>which will be prominent in the landscape. Proposals to reduce the impact of the care home on the landscape and on the village would be encouraged”.</del></i></p>
	<p><i>“Principle access to the site is from Hazeley Road with a secondary one through the housing at Northfields. Routing agreements through a Green Travel Plan, direct heavy lorries away from the village through the National Park via the Hazeley Road onto the Morestead Road by narrow C class roads.</i></p>	<ul style="list-style-type: none"> <li>For clarification, the HGV routing agreement was in fact secured through s106 legal agreement with the HEP Phase 1 permission in 2004 (it is not a ‘Green Travel Plan’ measure).</li> </ul>	<p><i>“Principle access to the site is from Hazeley Road with a secondary one through the housing at Northfields. <b>A Routing agreement secured through a S106 (as part of 03/000302/FULS)</b> , directs heavy lorries away from the village through the National Park via</i></p>

	<p><i>This is a substantial diversion from the shortest route to the trunk road system and is intended to avoid the village centre”.</i></p>	<ul style="list-style-type: none"> <li>• Although a similar routing agreement was not required for the HEP Phase 2 development, the Humphrey Group is voluntarily publicising and enforcing on a site-wide basis.</li> <li>• Suggest remove ‘narrow C class roads’ and the last sentence amended a proposal that future development/ redevelopment at the site should continue to respect the existing routing agreements which take heavy goods lorries away from the village centre.</li> <li>• Additional wording proposed to support the principle of opportunities to improve the access to the site in the future (thereby providing justification for the TNP’s in principle support for a new road access in the future).</li> </ul>	<p><del>the Hazeley Road onto the Morestead Road by narrow C class roads. This is a substantial diversion from the shortest route to the trunk road system and is intended to avoid the village centre.</del> <b>The outline permission for the replacement of the mill secures this through planning condition. The Humphrey Group continues to apply and enforce the routing agreement on a site-wide basis.</b>  <b>HEP Phase 1 was also implemented with a Green Travel Plan. Future proposals should continue to respect the routing agreement and Travel Plan measures”.</b></p>
	<p><i>“The site is in the countryside. SDLP Policy SD 35 requires that premises in commercial use should be retained for that purpose. BE1 defines the circumstances in which expansion and new development is to be permitted; applying the principles of SD 34 to the local considerations by excluding the expansion of most sites and buildings as the outstanding consents on this site amply fulfil their objectives of this policy”.</i></p>	<ul style="list-style-type: none"> <li>• Inappropriate to exclude the expansion of sites and buildings because ‘outstanding consents on this site amply fulfil their objectives of this policy’.</li> <li>• The potential for revised proposals on this site to come forward which increase the built form should not be pre-judged for this reason.</li> </ul>	<p><del>“The site is in the countryside. SDLP Policy SD 35 requires that premises in commercial use should be retained for that purpose. BE defines the circumstances in which expansion and new development is to be permitted; applying the principles of SD 34 to the local considerations by excluding the expansion of most sites and buildings as the outstanding</del></p>

		<ul style="list-style-type: none"> <li>To do so would contradict TNP Objective 2 (“promoting employment”) and the SA, which notes that the plan should not unduly restrict employment opportunities.</li> </ul>	<p><i>consents on this site amply fulfil their objectives of this policy”.</i></p>
	<p><i>“The preparation of a master plan for this major site would provide the context for further applications and be the means of addressing the issues identified in this policy. It applies similar objectives to the SDLP Development Strategy (SD 25.3), and is the only means of securing overall control of key aspects of the sites. The master plan should include land outside the defined boundary but in the same ownership to show landscaping, access to Northfields and Hazeley Road, and proposed land uses”.</i></p>	<ul style="list-style-type: none"> <li>Inappropriate and not in conformity with SDLP Policy SD5 and subtext 5.24 outline masterplans should only be used if a site is comprehensively redeveloped. SD5 requires proposals take a ‘landscape led approach’ unless scale of development warrants a “comprehensive masterplan”.</li> <li>Policy SD 25.3 (referenced) deals with the Development Strategy and says that in respect of “development proposals outside settlement boundaries within rural estates and large farms, positive regard will be had to.... (inter alia) proposals are part of a whole estate plan that has been endorsed by the National Park Authority”. Objective to use a masterplan to seek overall control is misguided and inappropriate.</li> <li>It would be inappropriate to impose a master plan on this established employment site that seeks to overwrite existing permissions, and</li> </ul>	<p><del><i>“The preparation of a master plan for this major site would provide the context for further applications and be the means of addressing the issues identified in this policy. It applies similar objectives to the SDLP Development Strategy (SD 25.3), and is the only means of securing overall control of key aspects of the sites. The master plan should include land outside the defined boundary but in the same ownership to show landscaping, access to Northfields and Hazeley Road, and proposed land uses”.</i></del></p> <p><b><i>“The mixed-use site has been evolving and upgrading for more than 10 years, controlled by planning permissions. Future applications should ensure that they continue to be considered in the context of the existing and permitted schemes at the site to ensure a comprehensive approach and to integrate successfully with the village”.</i></b></p>

		<p>noting para 6.52 of the SA which states that the Plan should not “unduly stifle employment opportunities in the parish”;</p> <ul style="list-style-type: none"> <li>• Even had there been justification for a master plan, it would place an additional planning control burden on the SDNPA to prepare and adopt the master plan;</li> <li>• Replace with general comment about future proposals continuing to have regard to the existing and permitted development at the site and integration with the village.</li> </ul>	
<p>Policy BE2.1                   Northfields Farm and Hazeley enterprise Park                  Redevelopment or Change of Use</p>	<p><i>“The site as shown on Map 6 is designated as a local employment site, subject to SDLP SD 35.4.                  Consents for expansion or redevelopment or change of use will be granted, within the currently developed area in accordance with Policy BE1 and subject to prior agreement of the following:-</i></p> <p><i>a) The removal of the feed mill                  b) The preparation of a master plan to cover the following matters for the whole of site outlined on Map 6 including:                  i) Hours of working                  ii) Traffic and its routing to minimize the impact on the village and the SDNP</i></p>	<ul style="list-style-type: none"> <li>• Welcome recognition that Northfields Farm Hazeley Enterprise Park contributes to SDNP and local employment offer but factually incorrect – it is not ‘designated’ or ‘allocated’ as a local employment site by SDLP. Site falls under SD35.3 – existing employment sites.</li> <li>• However, it is a mixed- use site and should be recognised this way to ensure it includes for the care home- a quasi-employment use which complements the transition from the employment site to the residential uses in the village.</li> </ul>	<p><del><i>“The site as shown on</i></del> <b><i>The site is identified on Map 6. As an existing (unallocated) employment site it is subject to</i></b> <del><i>is designated as a local employment site, subject to SDLP SD 35.4</i></del> <b><i>SD35.3. The site however has a mixed employment use and therefore consents for the expansion or redevelopment or change of use which complement this will be granted within the currently developed area in accordance with Policy BE1. Proposals should:– and which: subject to prior agreement of the following:-</i></b></p> <p><del><i>a) The removal of the feed mill                  b) The preparation of a master plan to cover the following</i></del></p>

	<p>iii) Landscaping to minimize the impact on the wider landscape including areas of planting identified on Map 6.          iv) Pedestrian and cycle routes”.</p>	<ul style="list-style-type: none"> <li>• Map 6 – designation of site as ‘Special Policy Area’ should be amended to identify the site only (consistent with Map 7 for Twyford School).</li> <li>• Criteria a) TNP cannot insist on removal of feed mill, this is an existing operational business. Repetitive of existing planning permission, therefore, inappropriate and unjustified.</li> <li>• Criteria b) masterplan requirement- this is inappropriate for the reasons expressed above in relation to the supporting text.</li> <li>• Matters i)-iv) of the masterplan are all repetition of matters which are duly considered in the planning control process and/ or information required by the local list for planning applications in the SDNPA. Therefore, unnecessary duplication of higher-level policy.</li> <li>• i) Hours of working can be controlled through appropriate planning conditions and is a standard planning consideration already.</li> <li>• ii) Traffic-The site (and the extant permissions) is already subject of/adheres to a routing agreement.</li> </ul>	<p><i>matters for the whole of site outlined on Map 6 including:</i></p> <ul style="list-style-type: none"> <li><i>i) Hours of working</i></li> <li><i>ii) Traffic and its routing to minimize the impact on the village and the SDNP</i></li> <li><i>iii) Landscaping to minimize the impact on the wider landscape including areas of planting identified on Map 6.</i></li> <li><i>iv) Pedestrian and cycle routes”.</i></li> </ul> <ul style="list-style-type: none"> <li><b>i) Be landscape-led and supported by a proportionate LVA which demonstrate the proposals have an acceptable landscape impact;</b></li> <li><b>ii) Adhere to the Green Travel Plan measures already implemented and routing agreements already in place, unless an alternative arrangement is justified to mitigate the travel impacts of a specific development proposal; and</b></li> <li><b>iii) Relate well to the existing village, through appropriate vehicle and pedestrian/cycle connections.</b></li> </ul>
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		<p>Future applications are likely to be required to adhere to this unless demonstrable reasons for another approach - suggest policy amended to reflect this. Duplication at MA4.</p> <ul style="list-style-type: none"> <li>• iii) Landscaping areas shown on Map 6 were not required by previous planning permissions despite appropriate assessment of landscape considerations. Mitigation of visual impacts was appropriately secured through the planning permission or pre-commencement conditions.</li> <li>• Terra Firma LCA assesses the character of the area and impacts of the housing sites only. It is therefore silent on whether mitigation is required in relation to the employment sites/policies. Therefore, there is no justification for this draft requirement.</li> <li>• The policy could, however, be amended to require a proportionate Landscape and Visual Assessment with all future proposals (albeit that would be repeating the requirement for planning applications in the SDNPA Local List of Requirements, July 2019).</li> </ul>	<p><b>Future proposals for development of the site may, depending on their scale and type, put unsustainable pressure on the local highway network. In which case, a new vehicular access will be supported in principle where appropriate justification, including benefits for the village, is provided with a planning application.</b></p> <p><b>Map 6 :</b></p> <ul style="list-style-type: none"> <li>- <b>Amend key</b> to replace blue line reference 'Special Policy Area' with '<b>Northfields Farm/ Hazeley Enterprise Park</b>' (as done for Twyford School on Map 7)</li> <li>- <b>Delete 'Landscaping' annotation completely.</b></li> </ul>
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		<ul style="list-style-type: none"> <li>• Landscaping shown on Map 6 is misleading, it ignores existing landscaping within these locations. Map 6 should be amended to remove requirement for new landscaping in the absence of supporting evidence.</li> <li>• With reference to the SA (Figure 6), the evidence base should be amended to show that this policy has a positive effect when assessed against the Employment Objective - "To promote the provision of local employment" (currently reported as having a negative impact).</li> </ul>	
<p>Policy BE2.2                  Northfields Farm and Hazeley Enterprise Park Care Home Consent</p>	<p><i>"As it appears unlikely that the 131 bed care home will now be built and the owners are known to be considering alternatives, the following additional criteria should be met for any new proposal:</i></p> <p><i>a) Should be in accordance with SD 35: employment land, or</i></p> <p><i>b) For any changes of use justified in accordance with SD 35 should:</i></p> <p><i>i) Benefit the community as a whole</i></p> <p><i>ii) Provision should be related to the needs and scale of the village</i></p> <p><i>iii) Relate well to existing village facilities</i></p> <p><i>iv) Have safe means of pedestrian access to facilities</i></p> <p><i>v) Not impact on existing medical services</i></p>	<ul style="list-style-type: none"> <li>• This policy would not comply with the basic conditions test. It seeks to impose more rigid controls over a site which already has an extant planning permission and is based on a speculation that the site is unlikely to come forward.</li> <li>• The extant permission would remain a material consideration in any future proposal.</li> <li>• Validity of criteria that the development should benefit the Twyford community as a whole and not impact on existing medical services is questionable. Private health care, especially for the</li> </ul>	<p><i>"As it appears unlikely that the 131 bed care home will now be built and the owners are known to be considering alternatives, the following additional criteria should be met for any new proposal:</i></p> <p><i>a) Should be in accordance with SD 35: employment land, or</i></p> <p><i>b) For any changes of use justified in accordance with SD 35 should:</i></p> <p><i>i) Benefit the community as a whole</i></p> <p><i>ii) Provision should be related to the needs and scale of the village</i></p> <p><i>iii) Relate well to existing village facilities</i></p>

	<p><i>vi) Satisfy all the normal landscape and other development requirements</i>  <i>vii) Be justified by local need”.</i></p>	<p>elderly, often reduces pressure on local health services.</p> <ul style="list-style-type: none"> <li>Any future proposals at the Northfields Farm/ Hazeley site should be dealt with under BE1.1. The policy is unnecessary and adds nothing to what the SDLP policies and the planning process already take account of.</li> <li>Suggest delete entire policy other than iii) which should be incorporated into Policy BE2.1 as shown in previous comment.</li> </ul>	<p><i>iv) Have safe means of pedestrian access to facilities</i>  <i>v) Not impact on existing medical services</i>  <i>vi) Satisfy all the normal landscape and other development requirements</i>  <i>vii) Be justified by local need”.</i></p>
<b>LHE: Landscape, Heritage and Ecology</b>			
<p>Policy LHE2</p> <p>Landscape Features and views</p> <p>Table 3- Important Parish Features and Views</p>	<p><i>“ The high ground at Northfields and Hazeley Enterprise Park where the feed mill is particularly prominent”</i></p>	<ul style="list-style-type: none"> <li>The Terra Firma Landscape Character Assessment Part 1 (2.11) refers to ‘Important visual landmarks and features which are within the landscape setting’. Whilst it refers to Northfields and HEP as prominent features, unlike the other features/ views we do not consider that it is recognising these as positive features to be retained/respected. Reference to the mill and HEP therefore don’t sit comfortably within this table as</li> </ul>	<p><i>“ The high ground at Northfields and Hazeley Enterprise Park” where the feed mill is particularly prominent.”</i></p>

		currently presented. This should be amended.	
	<i>“Long distance views of the landscape from Hazeley Road”</i>	<ul style="list-style-type: none"> <li>The allocation of Site 26 would adversely affect this as you approach the village as noted in the evidence base.</li> </ul>	
<p>Policy MA 4</p> <p>Access to Northfields/Hazeley Enterprise Park</p> <p>Purpose of the policy</p>	<p><i>“There is an existing Traffic Regulation Order, (TRO) prohibiting large goods vehicles over 7.5 tonnes from using the western section of Hazeley Road between the Northfields access and the crossroads in the middle of the village. This is not always complied with and large vehicles continue to make the tight turn across the front of the General Stores/ Post Office and use the narrow section of Hazeley Road that has numerous parked cars between the Post Office and Parish Hall car park. The owner of Northfields/Hazeley Enterprise Park has also erected signs advising all large goods vehicles to turn left out of the access and has installed a monitoring system. The formation of a new direct link from the bottom of Whites Hill into Northfields Farm/Hazeley Enterprise Park would provide environmental benefits to the village and reinforce the existing weight restriction along the village end of Hazeley Road”.</i></p>	<ul style="list-style-type: none"> <li>Some of the HEP buildings are subject of a routing agreement secured by S106. The Humphrey Group has voluntarily applied this to the mill and all other businesses at the Northfields Farm/ HEP site. Drivers who do not adhere to this are identified and warned by the Humphrey Group not to do this.</li> <li>Suggest the sentence about non-compliance is deleted or amended from the text.</li> <li>TRO is to prevent through traffic no traffic accessing sites in the parish</li> <li>Is this a planning matter? If not, then delete – serves no purpose in planning control.</li> <li>HEP’s traffic monitoring shows that a large percentage of heavy traffic movements between the centre of the village and the HEP entrance are actually through traffic.</li> </ul>	<p><del><i>“There is an existing Traffic Regulation Order, (TRO) prohibiting large goods vehicles over 7.5 tonnes from using the western section of Hazeley Road between the Northfields access and the crossroads in the middle of the village. This is not always complied with and large vehicles continue to make the tight turn across the front of the General Stores/ Post Office and use the narrow section of Hazeley Road that has numerous parked cars between the Post Office and Parish Hall car park. The owner of Northfields/Hazeley Enterprise Park has also erected signs advising all large goods vehicles to turn left out of the access and has installed a monitoring system. The formation of a new direct link from the bottom of Whites Hill into Northfields Farm/Hazeley Enterprise Park would provide environmental to</i></del></p>

		<ul style="list-style-type: none"> <li>• HEP traffic controlled by routing agreement already.</li> <li>• The specific location of a new access into the site has not been assessed, nor has evidence been provided to demonstrate it is required.</li> <li>• Please see our proposed amendments to draft Policy BE2.2 regarding the benefit of supporting the principle of a new route if future proposals justify one.</li> <li>• Suggest instead that this policy does not serve any meaningful purpose and that draft Policy BE2.2 is amended (along the lines we have suggested above).</li> </ul>	<p><i>the village and reinforce the existing weight restriction along the village end of Hazeley Road". "</i></p>
<p>Policy MA4</p> <p>Access to Northfields Farm/ Hazeley Enterprise Park</p>	<p><i>"The principle of a new highway access from B3335 Whites Hill into Northfields Farm/ Hazeley Enterprise Park is supported (see Map 6)".</i></p>	<ul style="list-style-type: none"> <li>• See comments on the purpose of policy MA4 and on BE2.2 (both above).</li> <li>• For these reasons, we suggest that the policy should be deleted.</li> </ul>	<p><i>"The principle of a new highway access from B3335 Whites Hill into Northfields Farm/ Hazeley Enterprise Park is supported (see Map 6)".</i></p> <p>Map 6 key to be amended to remove reference to a new vehicle route.</p>
<p>Policy PO1</p> <p>Pollution and Contaminated Land</p> <p>Purpose of the Policy Text &amp; Policy PO1</p>	<p>"The main sources of pollution in Twyford are: the B3335 and Hazeley Farm Feed Mill. The former is identified as Nitrous Oxide from vehicle emissions along the length of the village, exceeding recommended levels on occasions south of the Post Office. As the B3335 continues to</p>	<ul style="list-style-type: none"> <li>• There is no evidence provided with the TNP to support the assertion that the occasional smells from the mill are one of 2 main sources of pollution. The Policy adds nothing further than signposting the relevant SDLP policies. Recommend</li> </ul>	<p><del>The main sources of pollution in Twyford are: is the B3335 and Hazeley Farm Feed Mill. The former is identified as Nitrous Oxide from vehicle emissions along the length of the village, exceeding recommended levels on occasions south of the Post Office. As the B3335 continues to</del></p>

	<p>become busier, pollution levels are set to increase. The Mill gives rise to smell and is wind dependent. Other pollution includes noise from aircraft and road vehicles using the B3335 and the M3.                  Contaminated land is likely to occur only in limited parts of the village”.</p> <p><i>“Development proposals will be subject to SD 54 and SD 55.                  TPC will seek to reduce existing levels of pollution and mitigate further rises”.</i></p>	<p>that this section of the plan is deleted.</p> <ul style="list-style-type: none"> <li>• Mill is compliant with licence /environmental permit, so these matters are dealt with outside the planning system.</li> <li>• There is also obligation to remove the mill when implementing extant permissions.</li> </ul>	<p><del>become busier, pollution levels are set to increase. The Mill occasionally gives rise to smell and is however, this is wind dependent. Other pollution includes noise from aircraft and road vehicles using the B3335 and the M3.                  Contaminated land is likely to occur only in limited parts of the village”.</del></p> <p><del><i>“Development proposals will be subject to SD 54 and SD 55.                  TPC will seek to reduce existing levels of pollution and mitigate further rises”.</i></del></p>
<b>SB: Settlement Boundary</b>			
<b>SB2: Development Outside the Settlement</b>		<ul style="list-style-type: none"> <li>• Welcome the inclusion of specific policy for Northfields Farm and HEP recognising the requirement for special consideration given it is an established employment site.</li> </ul>	
<b>HN: Housing</b>			
<b>Policy HN1</b>	<p><i>“1. The mix of homes shall be as specified in SDLP SD 27                  2. The minimum dimensions of new housing shall accord with nationally described space standards.                  3. New housing for one, two, three or four bedroom houses will be permitted with maximum floor areas of 80 sq. metres; 100</i></p>	<ul style="list-style-type: none"> <li>• Points 1 and 2 duplicate other policy requirements of SDLP and national legislation. Suggest these are deleted.</li> <li>• If housing is to address need for the elderly wishing to downsize (as per the Housing Needs Study</li> </ul>	<p><del><i>1. The mix of homes shall be as specified in SDLP SD 27                  2. The minimum dimensions of new housing shall accord with nationally described space standards.                  3. New housing for one, two, three or four bedroom houses will be</i></del></p>

	<p><i>sq. metres, 120 sq. metres and 140 sq. metres, other than in accordance with HN6, respectively unless permitted by other policies. (Areas are gross internal i.e. excluding external walls)”.</i></p>	<p>carried out in April 2015 and reference in the NP), they are likely to require more facilities and larger floorspace for manoeuvrability etc than in other age groups moving in to properties with the same number of bedrooms.</p> <ul style="list-style-type: none"> <li>• Where is the evidence for maximum floor space requirements?</li> <li>• This limit on maximum space is unsubstantiated and likely to have impact on development viability of the preferred housing site(s), which could threaten the ability of the TNP to meet local housing need.</li> </ul>	<p><del>permitted with maximum floor areas of 80 sq. metres; 100 sq. metres; 120 sq. metres and 140 sq. metres, other than in accordance with HN6, respectively unless permitted by other policies. (Areas are gross internal i.e. excluding external walls)”.</del></p>
<p><b>Policy HN2</b>  <b>Housing Provision</b>  <b>Purpose of the Policy</b></p>	<p><i>“The SDNPA have carried out a number of studies to inform decisions about what number of houses should be delivered in different parts of the National Park. The assessment of evidence, including the capacity of the landscape and the availability of services and facilities within towns and villages, led to housing requirements for a number of villages within the National Park. Twyford is required to identify land for an additional 20 dwellings in the plan period.</i></p> <p><i>Twyford Parish Council has accepted this total as reasonable and so an</i></p>	<ul style="list-style-type: none"> <li>• The text should recognise that the Local Housing Need (LHN) for Twyford is about 35 households, therefore around 70 dwellings are needed to meet this need based on the adopted SDLP affordable housing policies, as reported in the SA (para 6.14).</li> <li>• Whilst SDLP Policy SD26 cites a minimum of 20 houses are to be provided in Twyford the policy outlines that this is ‘approximately’ and does not prevent the TNP from planning for more SDLP SD26 (4).</li> </ul>	<p><i>The SDNPA have carried out a number of studies to inform decisions about what number of houses should be delivered in different parts of the National Park. The assessment of evidence, including the capacity of the landscape and the availability of services and facilities within towns and villages, led to housing requirements for a number of villages within the National Park. Twyford is required to identify land for <del>an additional</del> <b>at least 20</b> dwellings in the plan period.</i></p>

	<p><i>allocation is to be made. This figure does not meet all the needs identified in the Housing Needs Survey. However, these needs can be met in several other ways, as described above, both in the village and in the surrounding settlements outside the National Park in which full provision is made.</i></p> <p><i>In addition to the allocation of 20 dwellings, housing will also be provided within the settlement boundary and in the countryside subject to other policies of this plan. Where proposals result in an increase in the number of dwellings, for example, if Stacey’s garage develops as housing, this would be counted as windfall, and would be in addition to the allocation.”</i></p>	<p>Specifically the adopted policy states “Neighbourhood Development Plans that accommodate higher levels of housing than is set out above will be supported by the National Park Authority providing that they meet local housing need and are in general conformity with the strategic policies of the development plan”.</p> <ul style="list-style-type: none"> <li>• The SA demonstrates that both S1 and Site 26 (subject to mitigation) could provide for housing without having adverse impacts. Therefore, both sites could be allocated which would go further towards meeting LHN while being in general conformity with the SDLP. This would still leave room for windfall sites, which can’t be relied upon to the extent which may be necessary to meet the LHN.</li> <li>• Relying on possible windfalls to make up the gap between the SDLP’s 20 homes (up to 10 affordable) (approximately) and the LHN is unrealistic, especially noting that draft policy HN3 notes that there are no sites within the settlement boundary;</li> </ul>	<p><del>Twyford Parish Council has accepted this total as reasonable and so an allocation is to be made. This figure does not meet all the needs identified in the Housing Needs Survey which is identified as approximately 35. The SDLP does however support NDP’s that accommodate higher levels than set out in SD26 where they are in general conformity with the strategic policies of the plan. However, Therefore, the TNP proposes to enable the ability to plan for more than 20 homes to make a positive effort to meet the local need reducing the pressure on neighbouring settlements to absorb unmet need. together with these needs can be met are which can be met in several proposed to be met in several other ways, as described above, both in the village and in the surrounding settlements outside the National Park in which full provision is made.</del></p> <p><i>In addition to the allocation of <b>at least XX dwellings</b>, housing will also be provided within the settlement boundary and in the countryside subject to other policies of this plan. Where proposals result in an increase in the number of dwellings, for example, if Stacey’s garage develops as housing, this would be counted as windfall, and would be in addition to the allocation.”</i></p>
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		<ul style="list-style-type: none"> <li>• Suggest HN2 and HN3 ‘Purpose of Policy’ text combined into one section.</li> </ul>	
<b>Policy HN2</b>	<p>“Provision will be made for additional housing by the allocation of additional land for 20 dwellings and by infilling and redevelopment within the settlement boundary and by other policies of this Plan”</p>	<ul style="list-style-type: none"> <li>• Suggest policy should be more flexible to enable a higher number of dwellings to be provided to meet identified LHN in accordance with the provisions of the SDLP Policy SD26 (as discussed above).</li> <li>• Policy HN2 however, adds no more than HN3 or SB1 and SB2 therefore suggest it is deleted and HN3 amended to incorporate spirit of HN2 to support flexibility to provide for more than 20 homes.</li> </ul>	<p><del>“Provision will be made for additional housing by the allocation of additional land on one or more sites for at least for 20 dwellings and by infilling and redevelopment within the settlement boundary and by other policies of this Plan”</del></p>
<p><b>Policy HN3 Land For Housing: site selection</b></p> <p><b>Purpose of Policy text</b></p>	<p><i>“Land has to be allocated to provide for a minimum of 20 houses. The allocation has to be outside the settlement boundary as there is no undeveloped land within the settlement boundary and no suitable brown field sites outside it. A comprehensive survey of all the sites around the village was carried out and local people were asked to say which they considered the best locations for housing (See map 3). Sites were assessed and ranked using the SDNPA’s own site assessment criteria with the addition of two others; firstly proximity to village facilities and secondly potential to provide a minimum of 11 dwellings to ensure on-site delivery of</i></p>	<ul style="list-style-type: none"> <li>• Map 3- Not appropriate to show all the sites that were assessed on map 3 (see below). This detail should be reserved for supporting evidence.</li> <li>• It is apparent from the evidence base, including the SA (Section 6) that S26 has been selected solely on its perceived potential to deliver the community benefits including an extended car parking area for the village.</li> <li>• It should be noted that CIL receipts from any site with the TNP area would also be available to contribute towards infrastructure such as the flood alleviation works, car parking and open space on Site 26.</li> </ul>	<p><i>“Land has to be allocated to provide for a minimum of 20 houses, however the local housing need is around 35. The allocation has to be outside the settlement boundary as there is no undeveloped land within the settlement boundary and no suitable brown field sites outside it. A comprehensive survey of all the sites around the village was carried out and local people were asked to say which they considered the best locations for housing (See map 3). Sites were assessed and ranked using the SDNPA’s own site assessment criteria with the addition of two others; firstly proximity to village facilities and secondly potential to provide a</i></p>

	<p><i>40% affordable dwellings.....</i></p> <p><i>.....The land adjacent to the Parish Hall and Surgery has been selected because of its closeness to village facilities and its potential to deliver further benefits, in particular, increased parking for the village centre and open space. It is also large enough to apply the affordable housing criteria for on-site provision. The development of this site provides the opportunity to incorporate flood mitigation on site and to support off site works required for the benefit of the whole Parish.</i></p> <p><i>The dwellings would be small (in accordance with housing Policy HN1) and so at a high density. The site is constrained by a clump of trees on the higher ground, which should remain as a feature and foil to new building. Flooding also affects the lower ground as identified in policy WE1 Flood Risk Management. The detailed policy for site 26, DB1, explains how the landscape and flooding issues have been addressed and how they are to be resolved. The boundaries of the site have been set following detailed design advice commissioned by Twyford Parish Council and further analysis of landscape impact.</i></p>	<ul style="list-style-type: none"> <li>• The SA (figure 5) and para 6.26 reports that S26 has significant negative impacts including on landscape and heritage.</li> <li>• SA para 6.21 states that it is not appropriate to allocate all of S26 as would be required to deliver 20 homes because of the landscape impact.</li> <li>• The SA considered various options including allocation S1 as well as S26, but without allowing for maximum capacity of both sites. It has not however considered the alternative option of allocation both sites to maximum capacity, which would have the benefit of meeting much more of the LHN.</li> <li>• Overall, the evidence base does not support the allocation of S26 only, and indeed if only one site were to be selected, the evidence points to S1, which is assessed to be significantly less constrained.</li> <li>• Evidence supports the allocation of both S26 and S1: the former because of its ability to include land for a car park extension, and the latter because it is the best performing site against the SA framework and because of the LHN.</li> </ul>	<p><i>minimum of 11 dwellings to ensure on-site delivery of 40% affordable dwellings.....</i></p> <p><i>.....<del>The</del><b>Both the land adjacent to the Parish Hall and Surgery (Site 26) and adjacent to Northfields Farm (S1) has</b> have-been selected. <b>Site 26</b> because of its closeness to village facilities and its potential to deliver further benefits, in particular, increased parking for the village centre and open space. It is also large enough to apply the affordable housing criteria for on-site provision. The development of this site provides the opportunity to incorporate flood mitigation on site and to support off site works required for the benefit of the whole Parish. <b>S1 has also been allocated because it performed best against the SA framework, it has limited constraints and can be appropriately developed for housing with limited impact on the special qualities the NP.</b></i></p> <p><i>The dwellings on both sites would be small (in accordance with housing Policy HN1) and so at a high density. <del>Site 26</del> The site is constrained by a clump of trees on the higher ground, which should remain as a feature and foil to new building. Flooding also affects the lower ground as identified in policy WE1 Flood Risk Management.</i></p>
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	<p><i>Policy DB1 sets out the detailed requirements for the development of site 26 for 20 dwellings.</i></p>		<p><i>The detailed policy for site 26, Policy DB1, explains the framework for development proposals for S1 and Site 26 how the landscape and flooding issues on Site 26 have been addressed and how they are to be resolved. For site 26 it refers to the constraints which need to be addressed through any development proposal. The boundaries of the site have <b>also</b> been set following detailed design advice commissioned by Twyford Parish Council and further analysis of landscape impact.</i></p> <p><del><i>Policy DB1 sets out the detailed requirements for the development of site 26 for 20 dwellings.</i></del></p>
<p>Policy HN3</p>	<p><i>“Land is allocated for 20 houses and additional parking and open space on Site 26 adjacent to the Parish Hall as shown on Map 3. Policy DB1 sets out the requirements for its development”.</i></p>	<ul style="list-style-type: none"> <li>• The SA shows that S1 can accommodate all 20 houses and performed better than Site 26 in SA Framework Objectives. It has no negative impacts.</li> <li>• Site 26 had 3 negative impacts landscape, heritage and water. The SA suggests that these can be overcome through mitigation, however the mitigation for landscape includes the provision of a detailed LVIA which demonstrates the design and layout of the site</li> </ul>	<p><i>“Land is allocated <b>to provide</b> for <b>at least XX houses</b> and additional parking and open space on <b>Sites S1 and Site 26 adjacent to the Parish Hall as shown on Map 3.</b> Policy DB1 sets <b>out a framework for development proposals for these sites</b> out the requirements for its development”.</i></p> <p><i>Map 3 to be amended to show sites S1 and Site 26 only.</i></p> <p><del><b>Add a new policy to allocate land at S1 (Northfields) for around 20 dwellings</b></del></p>

		<p>minimises impact on the landscape- this should be done now to ensure certainty this can be achieved.</p> <ul style="list-style-type: none"> <li>• SA suggests that only Site 26 would enable other objectives of the TNP including addressing flood alleviation and Car Parking to come forward, hence it is being taken forward. However, it is not confirmed why this is the case – for example the site does not include all the land required for the identified flood alleviation works.</li> <li>• Given the constraints and significant mitigation required for Site 26, notwithstanding the requirements for a Development Brief under draft Policy DB1, it is a high risk strategy to rely on this one site. There is a real risk that the costs of mitigation and site preparation would lead to a dilution of the affordable housing contribution, or worse case, the site is undeliverable in which case none of the housing benefits/needs would be met.</li> <li>• The SA recognises the uncertainty over the deliverability of S26, stating that in reference to the constraints “<i>Solutions have been identified but further information is required on the costs of the</i></li> </ul>	<p><del>[[further assessment of the site capacity should be completed]].</del></p>
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		<p><i>engineering schemes to ensure that a mitigation scheme can be delivered”.</i></p> <ul style="list-style-type: none"> <li>• The obvious remedy would be for more than one site to be allocated. The evidence base is clear that site S1 is the obvious alternative or additional site. The site is assessed by Terra Firma as being <i>“an extension to existing housing at Northfields. All necessary infrastructure is in place. Enclosed by a tree belt to North and planting to east. It has footpath Links to play area and countryside to North. A disadvantage is its distance from the village centre”</i><sup>2</sup></li> <li>• Unlike S26, site S1 was <i>“endorsed in whole”</i> by the landscape consultant.</li> <li>• The site is subject to <i>“significant public support”</i><sup>3</sup>.</li> <li>• The relative distance from the village centre is at least partially compensated by its proximity to the major employment area in the community, and proximity to local play areas, the bus stop on Cox’s Hill close to the junction with Northfields (served by routes 69,</li> </ul>	
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<sup>2</sup> Twyford Neighbourhood Plan – Housing Site Selection Process – Updated to include the further evaluation of Site S1 and Site 26 – Dec 2019

<sup>3 3</sup> Twyford Neighbourhood Plan – Housing Site Selection Process – Updated to include the further evaluation of Site S1 and Site 26 – Dec 2019 (page 7).

		<p>623, 691, 692 and E1) and the church. Allocation of S1 in the TNP, in addition to Site 26 would ensure flexibility, provide greater choice of homes in line with National Policy objectives, and significantly de-risk delivering the housing objectives of the plan.</p> <ul style="list-style-type: none"> <li>• Allocation of a second site would increase the prospective CIL monies, 25% of which can be retained locally once the TNP is adopted.</li> <li>• Reference to DB1 to include S1 and to ensure that DB1 is not too prescriptive, the policy should comprise a framework which allows for flexibility in development proposals coming forward.</li> </ul>	
<p>Policy HN4                  Affordable provision on allocated and windfall sites</p>	<p><i>“1. Provision for affordable housing will be made at 50% in accordance with SDLP SD 28.                  2. The occupation of affordable housing will be limited to people with strong local connections to Twyford Parish. The eligibility criteria are those agreed for the most recent scheme at Hewlett Close. Priority is to be given to those born and educated in the Parish and those who have been resident in the Parish for a long time and have close relatives in the Parish”.</i></p>	<ul style="list-style-type: none"> <li>• The requirement for 50% affordable on all sites is not in conformity with the SDLP Policy SD28, which has a sliding scale depending on number of dwellings.</li> <li>• The requirement for occupation being limited to people with ‘strong local links’ is not defined and not clear how this would be enforced in planning terms.</li> <li>• The Policy duplicates SDLP Policy SD28 and therefore should be deleted.</li> </ul>	<p><del><i>1. Provision for affordable housing will be made at 50% in accordance with SDLP SD 28.                  2. The occupation of affordable housing will be limited to people with strong local connections to Twyford Parish. The eligibility criteria are those agreed for the most recent scheme at Hewlett Close. Priority is to be given to those born and educated in the Parish and those who have been resident in the Parish for a long time and have close relatives in the Parish”.</i></del></p>

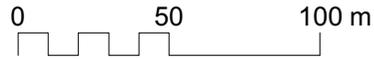
<p>Policy DB1</p>	<p><i>"The land adjoining the Parish Hall Car Park, (as shown on Map 14,), is allocated for the development of 20 houses, subject to the preparation of a development brief to incorporate:</i></p> <p><i>a) A minimum of 50% affordable dwellings.</i></p> <p><i>b) A mix of houses in accordance with policy HN1.</i></p> <p><i>c) Additional parking for around 20 cars, with further land for an additional 20 spaces, or other community use adjacent to the existing car park.</i></p> <p><i>d) The area of the tree clump as open space.</i></p> <p><i>e) The preparation of a comprehensive landscape scheme incorporating land to the east in the same ownership.</i></p> <p><i>f) The retention of boundary trees.</i></p> <p><i>g) Flood management measures as part of a comprehensive scheme for the land between B3335 and Bourne Lane.</i></p> <p><i>h) Foul sewerage scheme which does not impact on that part of the system which malfunctions in periods of high surface water flows.</i></p> <p><i>i) Design is</i></p> <p><i>a) to relate positively to the Surgery and Parish Hall</i></p> <p><i>b) to follow the principles of the layout (shown on Map 14)</i></p>	<ul style="list-style-type: none"> <li>• Policy should be amended to include for both S1 and Site 26.</li> <li>• Support the provision of a brief for the allocated sites to assist developers and SDNP with working towards a positive scheme. However, this should be more of a 'framework', it is too prescriptive to refer to a layout such as Map 14.</li> <li>• Reference to other policies isn't required and should be deleted.</li> <li>• The protection/ retention of features on site can be cited but more flexibility should be allowed in terms of how this is done (d).</li> <li>• The Brief can't make demand about other land outside of the site even if it is in the same ownership (e) and (g).</li> </ul>	<p><b><i>"The sites known as S1 and Site 26 are land adjoining the Parish Hall Car Park, (as shown on Map 14,), is allocated for the development of at least XX<sup>4</sup> houses, subject to the preparation of a development brief. <del>to incorporate:</del></i></b></p> <p><b><i>The brief for Site 26 should accord with the wider policies of this NP and the Development Plan and incorporate:</i></b></p> <p><del><i>a) A minimum of 50% affordable dwellings.</i></del></p> <p><del><i>b) A mix of houses in accordance with policy HN1.</i></del></p> <p><i>c) Additional parking for around 20 cars, with further land for an additional 20 spaces, or other community use adjacent to the existing car park.</i></p> <p><i>d) The area of the tree clump to be <b>protected as open space.</b></i></p> <p><i>e) The preparation of a comprehensive landscape scheme incorporating land to the east in the same ownership.</i></p> <p><i>f) The retention of boundary trees.</i></p> <p><i>g) Flood management measures as part of a comprehensive scheme for the land between B3335 and Bourne Lane.</i></p>
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<sup>4</sup> It is recommended that the Parish Council undertakes further assessment of the potential capacity of S26 and S1 combined, and considers to what extent it should plan positively to meet the identified LHN over the TNP period.

	<p><i>unless there are clear advantages of an alternative layout.</i></p> <p><i>c) accord with DE1.</i></p> <p><i>j) Management of the land excluded from development.</i></p> <p><i>k) Adherence to a Construction Environmental Management Plan coupled with careful design and the utilisation of standard pollution guidance to ensure adverse water quality effects on the River Itchen SAC is avoided.</i></p> <p><i>l) A drainage plan must be provided to show that the drainage associated with the site will either utilise an existing mains drainage system at the nearest point of capacity or will be dealt with by a small package treatment plant (or similar). If the decision is to use a small package treatment plant then the drainage plan will need to demonstrate that there is no hydrological connectivity from the proposed Package Treatment Plant to the River Itchen for example are there existing watercourse or local drainage channels or a high water table, in the area of the proposed package treatment plan that will mean that the proposed package treatment would not be effective and would result in there being a high risk that phosphorous transferred into the protected River Itchen SAC and SSSI”.</i></p>		<p><i>h) Foul sewerage scheme which does not impact on that part of the system which malfunctions in periods of high surface water flows.</i></p> <p><b>The brief for Site 1 should accord with the wider policies of this NP and the Development Plan and incorporate:</b></p> <p><b>[criteria to be confirmed].</b></p>
Map 14	Land for Housing – Site 26	<ul style="list-style-type: none"> <li>It is not appropriate to provide a detailed layout plan for the proposed housing allocation(s). Layout is subject to detailed site</li> </ul>	Delete Map 14

		<p>investigations and design process through the standard planning control process.</p> <ul style="list-style-type: none"> <li>• This Map is in danger of raising expectations unduly about the deliverability of the site.</li> <li>• The preliminary design work should remain in the evidence base.</li> <li>• Similar supporting evidence could be provided if S1 is also allocated, in line with the site selection evidence.</li> </ul>	
Table 1 Open Spaces in Public or Charitable Ownership or subject to formal agreement	<i>'Humphrey Developments (under Planning Condition) Winchester City Council'</i>	<ul style="list-style-type: none"> <li>• Ownership name incorrect- needs amending.</li> </ul>	<i>"Humphrey-Developments <b>Family</b> (under Planning Condition) Winchester City Council".</i>

Appendix B – Planning Permissions at Hazeley Enterprise Park (Drawing 50801 SK1- 01)



KEY	
Permissions within 'Special Policy Area' (Map 6)	
	SDNP/14/05196/REM
	SDNP/17/02639/FUL
	03/00302/FUL (WCC)

REV.	DATE	AMENDMENTS	DRAWN	CHECKED

CLIENT:  
**Humphrey Group**

PROJECT:  
**Twyford Neighbourhood Plan**

DRAWING:  
**Planning Permissions at  
Hazeley Enterprise Park**

DATE:  
**March 2021**

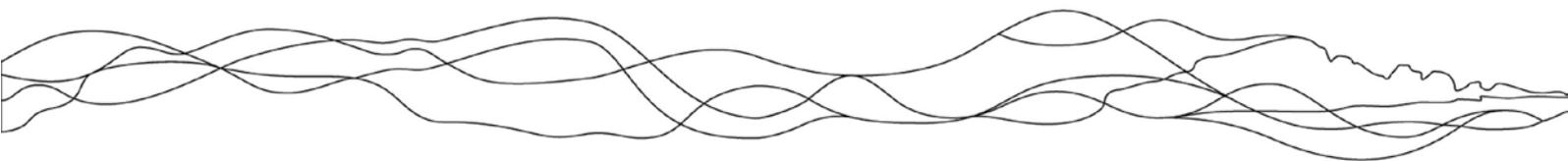
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 SIZE: **A4**  
 JOB NO: **50801**  
 DWG NO: **SK1-01**  
 REV: **#**



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Respondent Reference:	R14
Organisation or Individual:	Environment Agency
Agent Details:	N/A



**From:** [Brothwell, Hannah](#)  
**To:** [Chris Paterson](#)  
**Subject:** RE: Twyford Neighbourhood Plan - Submission to the South Downs National Park Authority  
**Date:** 26 March 2021 09:09:03  
**Attachments:** [image002.png](#)  
[image003.jpg](#)

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Thank you for consulting the Environment Agency on the above Neighbourhood Plan. We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

[http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT\\_6524\\_7da381.pdf](http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf)

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.

#### **Flood Risk**

We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding and located within Flood Zone 1.

Kind regards

Hannah

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